

Exhibit C

W. R. Grace Asbestos Personal Injury Questionnaire



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RE:

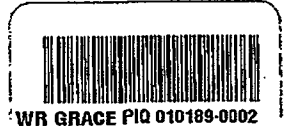
Morris & Sakalarios
610 West Pine Street
Hattiesburg MS 39401

REDACTED

REC'D JUN 28 2006



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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE



In re:) Chapter 11
W. R. GRACE & CO., et al.,) Case No. 01-01139 (JKF)
Debtors.) Jointly Administered
)
)

W. R. Grace Asbestos Personal Injury Questionnaire

YOU HAVE RECEIVED THIS QUESTIONNAIRE BECAUSE GRACE BELIEVES THAT YOU HAD SUED ONE OR MORE OF THE DEBTORS LISTED IN APPENDIX A ATTACHED TO THIS QUESTIONNAIRE BEFORE GRACE FILED FOR BANKRUPTCY ON APRIL 2, 2001 FOR AN ASBESTOS-RELATED PERSONAL INJURY OR WRONGFUL DEATH CLAIM, AND THAT CLAIM WAS NOT FULLY RESOLVED.

IF YOU HAVE SUCH A CLAIM, YOU MUST COMPLETE AND SUBMIT THIS QUESTIONNAIRE BY JANUARY 12, 2006 TO RUST CONSULTING, INC., THE CLAIMS PROCESSING AGENT, AT ONE OF THE FOLLOWING ADDRESSES:

IF SENT BY U.S. MAIL

RUST CONSULTING, INC.
CLAIMS PROCESSING AGENT
RE: W.R. GRACE & CO. BANKRUPTCY
P.O. BOX 1620
FARIBAULT, MN 55021

IF SENT BY FEDERAL EXPRESS, UNITED PARCEL
SERVICE, OR A SIMILAR HAND DELIVERY SERVICE

RUST CONSULTING, INC.
CLAIMS PROCESSING AGENT
RE: W.R. GRACE & CO. BANKRUPTCY
201 S. LYNDAL AVE.
FARIBAULT, MN 55021

A QUESTIONNAIRE (AND ANY AMENDMENTS OR ADDITIONAL DOCUMENTS IN SUPPORT OF THE QUESTIONNAIRE) WILL NOT BE CONSIDERED UNLESS RECEIVED BY RUST CONSULTING, INC. BY JANUARY 12, 2006.

THIS QUESTIONNAIRE IS AN OFFICIAL DOCUMENT APPROVED BY THE COURT IN CONNECTION WITH ESTIMATING GRACE'S ASBESTOS-RELATED PERSONAL INJURY AND WRONGFUL DEATH CLAIMS AS A WHOLE. THE QUESTIONNAIRE IS BEING USED BY W. R. GRACE AS A MEANS TO SEEK INFORMATION ABOUT YOUR ASBESTOS CLAIM. BY TIMELY RETURNING THE QUESTIONNAIRE AS COMPLETELY AND ACCURATELY AS POSSIBLE, GRACE, THE OFFICIAL COMMITTEES, AND THE FUTURE CLAIMANTS REPRESENTATIVE WILL SEEK TO PRIORITIZE THE PROCESSING OF YOUR CLAIM UNDER ANY TRUST DISTRIBUTION PROCEDURES APPROVED AS PART OF A PLAN OF REORGANIZATION.

THE COURT HAS ORDERED THAT, AS PART OF THE DISCOVERY PROCESS, ALL HOLDERS OF PRE-PETITION ASBESTOS PERSONAL INJURY CLAIMS MUST COMPLETE AND RETURN THIS QUESTIONNAIRE. THUS, FAILURE TO TIMELY RETURN THE QUESTIONNAIRE AS COMPLETELY AND ACCURATELY AS POSSIBLE MAY RESULT IN SANCTIONS AND/OR OTHER RELIEF AVAILABLE UNDER APPLICABLE FEDERAL RULES.

BECAUSE YOUR CLAIM WILL BE EVALUATED IN ACCORDANCE WITH THE TRUST DISTRIBUTION PROCEDURES APPROVED AS PART OF A PLAN OF REORGANIZATION, COMPLETION OF THIS QUESTIONNAIRE DOES NOT MEAN THAT YOUR CLAIM WILL EITHER BE ALLOWED OR PAID. TO THE EXTENT YOU ATTACH TO THIS QUESTIONNAIRE DOCUMENTS ALSO NEEDED BY THE TRUST TO PROCESS YOUR CLAIM, SUCH DOCUMENTS WILL BE PROVIDED TO THE TRUST AND YOU WILL NOT NEED TO RESUBMIT THEM.



WR GRACE PIQ 010189-0004

INSTRUCTIONS

A. GENERAL

1. This Questionnaire refers to any lawsuit that you filed before April 2, 2001 for an "asbestos-related personal injury or wrongful death claim." This term is intended to cover any lawsuit alleging any claim for personal injuries or damages that relates to: (a) exposure to any products or materials containing asbestos that were manufactured, sold, supplied, produced, specified, selected, distributed or in any way marketed by one or more of the Debtors (or any of their respective past or present affiliates, or any of the predecessors of any of the Debtors or any of their respective past or present affiliates), or (b) exposure to vermiculite mined, milled or processed by the Debtors (or any of their respective past or present affiliates, any of the predecessors of any of the Debtors or any of their predecessors' respective past or present affiliates). It includes claims in the nature of or sounding in tort, or under contract, warranty, guarantee, contribution, joint and several liability, subrogation, reimbursement, or indemnity, or any other theory of law or equity, or admiralty for, relating to, or arising out of, resulting from, or attributable to, directly or indirectly, death, bodily injury, sickness, disease, or other personal injuries or other damages caused, or allegedly caused, directly or indirectly, and arising or allegedly arising, directly or indirectly, from acts or omissions of one or more of the Debtors. It includes all such claims, debts, obligations or liabilities for compensatory damages such as loss of consortium, personal or bodily injury (whether physical, emotional or otherwise), wrongful death, survivorship, proximate, consequential, general, special, and punitive damages.
2. Your Questionnaire will be deemed filed only when it has been received by Rust Consulting Inc., the Claims Processing Agent, via U.S. Mail, Federal Express, United Parcel Service or a similar hand delivery service. A Questionnaire that is submitted by facsimile, telecopy or other electronic transmission will not be accepted and will not be deemed filed.

Do not send any Questionnaire to the Debtors, counsel for the Debtors, the Future Claimants Representative, the Official Committee of Unsecured Creditors, the Official Committee of Asbestos Personal Injury Claimants, the Official Committee of Asbestos Property Damage Claimants, the Official Committee of Equity Security Holders, or such Committees' counsel. Questionnaires that are filed with or sent to anyone other than Rust Consulting, Inc. will be deemed not to have been submitted, and such Questionnaires will not be considered.
3. Your completed Questionnaire must (i) be written in English, and (ii) attach relevant supporting materials as instructed further below.
4. All holders of claims described on page i (and as described in further detail in Instruction A (1) above) are required to file this Questionnaire by Jan. 12, 2006. Your Questionnaire will be used in connection with the estimation hearing to be conducted by the Court pursuant to the Estimation Procedures Order (a copy of which is attached as Appendix B).
5. Any subsequent amendment to the Questionnaire will not be considered for any purpose unless received by Jan. 12, 2006.

B. PART I -- Identity of Injured Person and Legal Counsel

Respond to all applicable questions. If you are represented by a lawyer, then in Part I (b), please provide your lawyer's name and the name, telephone number and address of his/her firm. If you are represented by a lawyer, he/she must assist in the completion of this Questionnaire. Also, if you would prefer that the Debtors send any additional materials only to your lawyer, instead of sending such materials to you, then check the box indicating this in Part I (b).

All references to "you" or the like in Parts I through X shall mean the injured person. If the injured person is deceased, then the executor of the person's will (or similar estate representative) must complete this Questionnaire.

C. PART II -- Asbestos-Related Condition(s)

Please indicate all asbestos-related medical conditions for which you have been diagnosed. To complete questions related to injuries, medical diagnoses, and/or conditions, please use the following categories of customarily diagnosed conditions:

- Mesothelioma
- Asbestos-Related Lung Cancer
- Other Cancer (colon, laryngeal, esophageal, pharyngeal, or stomach)
- Clinically Severe Asbestosis
- Asbestosis
- Other Asbestos Disease

If you have been diagnosed with multiple conditions and/or if you received diagnoses and diagnostic tests relating to the same condition by multiple doctors, please complete a separate Part II for each initial diagnosis and any previous or subsequent diagnoses or diagnostic tests that change or conflict with the initial diagnosis. For your convenience, additional copies of Part II are attached as Appendix C to this Questionnaire.

Supporting Documents for Diagnosis: This Questionnaire must be accompanied by copies, with access to originals upon request, of any and all documents you, your counsel, or your doctors have or subsequently obtain that support or conflict with your diagnosis.

X-rays and B-reads: Please attach all x-ray readings and reports. You may, but are not required to, attach chest x-rays. The court, however, has ruled that Grace may seek access to chest x-rays upon request.

Pulmonary Function Tests: Please attach all pulmonary function test results, including the actual raw data and all spirometric tracings, on which the results are based.



WR GRACE PIQ 010189-0005

D. PART III – Direct Exposure to Grace Asbestos-Containing Products

In Part III, please provide the requested information for the job and site at which you were exposed to Grace asbestos-containing products. Indicate the dates of exposure to each Grace asbestos-containing product. If your exposure was a result of your employment, use the list of occupation and industry codes below to indicate your occupation and the industry in which you worked at each site. If you allege exposure to Grace asbestos-containing products at multiple sites, the Court has ordered that you must complete a separate Part III for each site. For your convenience, additional copies of Part III are attached as Appendix D to this Questionnaire.

Attach copies of any and all documents establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the disease.

Occupation Codes

- | | |
|--|---|
| 01. Air conditioning and heating installer/maintenance | 31. Iron worker |
| 02. Asbestos miner | 32. Joiner |
| 03. Asbestos plant worker/asbestos manufacturing worker | 33. Laborer |
| 04. Asbestos removal/abatement | 34. Longshoreman |
| 05. Asbestos sprayer/spray gun mechanic | 35. Machinist/machine operator |
| 06. Assembly line/factory/plant worker | 36. Millwright/mill worker |
| 07. Auto mechanic/bodywork/brake repairman | 37. Mixer/bagger |
| 08. Boilermaker | 38. Non-asbestos miner |
| 09. Boiler repairman | 39. Non-occupational/residential |
| 10. Boiler worker/cleaner/inspector/engineer/installer | 40. Painter |
| 11. Building maintenance/building superintendent | 41. Pipefitter |
| 12. Brake manufacturer/installer | 42. Plasterer |
| 13. Brick mason/layer/hod carrier | 43. Plumber - install/repair |
| 14. Burner operator | 44. Power plant operator |
| 15. Carpenter/woodworker/cabinetmaker | 45. Professional (e.g., accountant, architect, physician) |
| 16. Chipper | 46. Railroad worker/carman/brakeman/machinist/conductor |
| 17. Clerical/office worker | 47. Refinery worker |
| 18. Construction - general | 48. Remover/installer of gaskets |
| 19. Custodian/janitor in office/residential building | 49. Rigger/stevedore/seaman |
| 20. Custodian/janitor in plant/manufacturing facility | 50. Rubber/tire worker |
| 21. Electrician/inspector/worker | 51. Sandblaster |
| 22. Engineer | 52. Sheet metal worker/sheet metal mechanic |
| 23. Firefighter | 53. Shipfitter/shipwright/ship builder |
| 24. Fireman | 54. Shipyard worker (md. repair, maintenance) |
| 25. Flooring installer/tile installer/tile mechanic | 55. Steamfitter |
| 26. Foundry worker | 56. Steelworker |
| 27. Furnace worker/repairman/installer | 57. Warehouse worker |
| 28. Glass worker | 58. Welder/blacksmith |
| 29. Heavy equipment operator (includes truck, forklift, & crane) | 59. Other |
| 30. Insulator | |

Industry Codes

- | | |
|--|--|
| 001. Asbestos abatement/removal | 109. Petrochemical |
| 002. Aerospace/aviation | 110. Railroad |
| 100. Asbestos mining | 111. Shipyard-construction/repair |
| 101. Automotive | 112. Textile |
| 102. Chemical | 113. Tire/rubber |
| 103. Construction trades | 114. U.S. Navy |
| 104. Iron/steel | 115. Utilities |
| 105. Longshore | 116. Grace asbestos manufacture or milling |
| 106. Maritime | 117. Non-Grace asbestos manufacture or milling |
| 107. Military (other than U.S. Navy) | 118. Other |
| 108. Non-asbestos products manufacturing | |

**E. PART IV -- Indirect Exposure to Grace Asbestos-Containing Products**

In Part IV, please provide the information requested for any injury alleged to have been caused by exposure to asbestos-containing products through contact/proximity with another injured person. If you have exposure through contact/proximity with multiple injured persons, please complete a separate Part IV for each injured person. For your convenience, additional copies of Part IV are attached as Appendix E to this Questionnaire.

F. PART V -- Exposure to Non-Grace Asbestos-Containing Products

In Part V, please provide the requested information for each party against which you have filed a lawsuit and/or claim alleging exposure to asbestos-containing products other than Grace products. If you filed such lawsuits and/or claims against multiple parties, the Court has ordered that you must complete a separate Part V for each party. If exposure was in connection with your employment, use the list of occupation and industry codes in Part III to indicate your occupation and the industry in which you worked. For your convenience, additional copies of Part V are attached as Appendix F to this Questionnaire.

G. PART VI -- Employment History

In Part VI, please provide the information requested for each industrial job you have held, other than jobs already listed in Parts III or V. Use the list of occupation and industry codes in the instructions to Part III to indicate your occupation and the industry in which you worked for each job. Please use the copy of Part VI attached as Appendix G to this Questionnaire if additional space is needed.

H. PART VII -- Litigation and Claims Regarding Asbestos and/or Silica

In Part VII, please describe any lawsuits and/or claims that were filed by you or on your behalf regarding asbestos or silica.

I. PART VIII -- Claims by Dependents or Related Persons

Part VIII is to be completed only by dependents or related persons (such as spouse or child) of an injured person who sued the Debtors before April 2, 2001 for an asbestos-related personal injury or wrongful death claim against Grace not involving physical injury to him-/herself on account of his/her own exposure. One example of such a claim would be a claim for loss of consortium. If you are asserting such a claim, complete the entire Questionnaire, providing all information and documentation regarding the injured person.

J. PART IX -- Supporting Documentation

In Part IX, please mark the boxes next to each type of document that you are submitting with this Questionnaire. As indicated in the instructions to Parts II and III, this Questionnaire must be accompanied by copies, with access to originals upon request, of any and all documents you, your counsel, or your doctors have or subsequently obtain that (a) support or conflict with your diagnosis and/or (b) establish exposure to Grace asbestos-containing products as having a substantial causal role in the development of the medical diagnoses, and/or conditions claimed. Original documents provided to Grace will be returned within a reasonable time after its professionals and experts have reviewed the documents.

Grace will reimburse your reasonable expenses incurred in providing (a) copies of depositions you have given in lawsuits in which Grace was not a party and/or (b) any documents you have previously provided to Grace in prior litigation. Please indicate the documents for which you are seeking reimbursement and attach a receipt for such cost.

K. PART X -- Attestation that Information is True, Accurate and Complete

By signing Part X, you, the injured person, are attesting and swearing, under penalty of perjury, that, to the best of your knowledge, all of the information in this Questionnaire is true, accurate and complete. If the injured person is deceased, then the executor of the person's will (or similar estate representative) must complete and sign Part X on behalf of the injured person.

The legal representative of the injured person must complete and sign Part X where indicated.

PART II: ASBESTOS-RELATED CONDITION(S) (Continued)

WR GRACE PIQ 010189-0008

- b. **Asbestos-Related Lung Cancer:** If alleging Asbestos-Related Lung Cancer, were you diagnosed with primary lung cancer based on the following (check all that apply):
- ☐ findings by a pathologist certified by the American Board of Pathology
 - ☐ evidence of asbestosis based on a chest x-ray reading of at least 1/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a B-reader certified by the National Institute for Occupational Safety and Health
 - ☐ evidence of asbestosis based on a chest x-ray reading of at least 1/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a second B-reader certified by the National Institute for Occupational Safety and Health
 - ☐ evidence of asbestosis determined by pathology
 - ☐ evidence of asbestos-related nonmalignant disease based on a chest x-ray reading of at least 1/0 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a B-reader certified by the National Institute for Occupational Safety and Health
 - ☐ evidence of asbestos-related nonmalignant disease based on a chest x-ray reading of at least 1/0 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a second B-reader certified by the National Institute for Occupational Safety and Health
 - ☐ diffuse pleural thickening as defined in the International Labour Organization's *Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses (2000)*
 - ☐ a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the lung cancer
 - ☐ other (please specify): _____
- c. **Other Cancer:**
- (i) If alleging Other Cancer, please mark the box(es) next to the applicable primary cancer(s) being alleged:
- ☐ colon ☐ pharyngeal ☐ esophageal ☐ laryngeal ☐ stomach cancer
- ☐ other, please specify: _____
- (ii) Were you diagnosed with the above-indicated cancer based on the following (check all that apply):
- ☐ findings by a pathologist certified by the American Board of Pathology
 - ☐ evidence of asbestosis based on a chest x-ray reading of at least 1/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a B-reader certified by the National Institute for Occupational Safety and Health
 - ☐ evidence of asbestosis based on a chest x-ray reading of at least 1/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* and (b) by a second B-reader certified by the National Institute for Occupational Safety and Health
 - ☐ evidence of asbestosis determined by pathology
 - ☐ a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the cancer
 - ☐ other (please specify): _____

PART II: ASBESTOS-RELATED CONDITION(S) (Continued)

WR GRACE PIQ 010189-0009

d. **Clinically Severe Asbestosis:** If alleging Clinically Severe Asbestosis, was your diagnosis based on the following (check all that apply):

- ☐ diagnosis of a pulmonologist or internist certified by the American Board of Internal Medicine
- ☐ a chest x-ray reading of at least 2/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's 2000 *International Classification of Radiographs of Pneumoconioses* and (b) by a B-reader certified by the National Institute for Occupational Safety and Health
- ☐ a chest x-ray reading of at least 2/1 on the ILO grade scale (a) conducted in compliance with the standards set forth in the International Labour Organization's 2000 *International Classification of Radiographs of Pneumoconioses* and (b) by a second B-reader certified by the National Institute for Occupational Safety and Health
- ☐ asbestosis determined by pathology
- ☐ a pulmonary function test, conducted in accordance with the standards set forth in the American Thoracic Society's *Lung Function Testing; Selection of Reference Values and Interpretive Strategies*, demonstrating total lung capacity less than 65% predicted
- ☐ a pulmonary function test, conducted in accordance with the standards set forth in the American Thoracic Society's *Lung Function Testing; Selection of Reference Values and Interpretive Strategies*, demonstrating forced vital capacity less than 65% predicted and a FEV1/FVC ratio greater than or equal to 65% predicted
- ☐ a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the asbestosis
- ☐ other (please specify): _____

e. **Asbestosis:** If alleging Asbestosis, was your diagnosis based on the following (check all that apply):

- ☐ diagnosis of a pulmonologist or internist certified by the American Board of Internal Medicine
- ☐ a chest x-ray reading conducted in compliance with the standards set forth in the International Labour Organization's 2000 *International Classification of Radiographs of Pneumoconioses* by a B-reader certified by the National Institute for Occupational Safety and Health, with one of the following: (i) at least 1/0 on the ILO grade scale, or (ii) diffuse pleural thickening as defined in the ILO's *Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses* (2000)
- ☐ a chest x-ray reading conducted in compliance with the standards set forth in the International Labour Organization's 2000 *International Classification of Radiographs of Pneumoconioses* by a second B-reader certified by the National Institute for Occupational Safety and Health, with one of the following: (i) at least 1/0 on the ILO grade scale, or (ii) diffuse pleural thickening as defined in the ILO's *Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses* (2000)
- ☐ asbestosis determined by pathology
- ☐ a pulmonary function test, conducted in accordance with the standards set forth in the American Thoracic Society's *Lung Function Testing; Selection of Reference Values and Interpretive Strategies*, demonstrating a FEV1/FVC ratio greater than or equal to 65% predicted with either (a) total lung capacity less than 80% predicted or (b) forced vital capacity less than 80% predicted
- ☐ a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the asbestosis

☒ other (please specify):

See Attachment

PART II: ASBESTOS-RELATED CONDITION(S) (Continued)

WR GRACE PIQ 010189-0010

f. **Other Asbestos Disease:** If alleging any asbestos-related injuries, medical diagnoses, and/or conditions other than those above, was your diagnosis based on the following (check all that apply):

- ☐ diagnosis of a pulmonologist or internist certified by the American Board of Internal Medicine
- ☐ diagnosis determined by pathology
- ☐ a chest x-ray reading conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* by a B-reader certified by the National Institute for Occupational Safety and Health, with one of the following: (i) at least 1/0 on the ILO grade scale, or (ii) diffuse pleural thickening as defined in the ILO's *Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses* (2000)
- ☐ a chest x-ray reading conducted in compliance with the standards set forth in the International Labour Organization's *2000 International Classification of Radiographs of Pneumoconioses* by a second B-reader certified by the National Institute for Occupational Safety and Health, with one of the following: (i) at least 1/0 on the ILO grade scale, or (ii) diffuse pleural thickening as defined in the ILO's *Guidelines for the Use of the ILO International Classification of Radiographs and Pneumoconioses* (2000)
- ☐ a chest x-ray reading other than those described above
- ☐ a pulmonary function test, conducted in accordance with the standards set forth in the American Thoracic Society's *Lung Function Testing; Selection of Reference Values and Interpretive Strategies*, demonstrating a FEV1/FVC ratio greater than or equal to 65% predicted with either (a) total lung capacity less than 80% predicted or (b) forced vital capacity less than 80% predicted
- ☐ a pulmonary function test other than that discussed above
- ☐ a supporting medical diagnosis and supporting documentation establishing that exposure to Grace asbestos-containing products had a substantial causal role in the development of the condition
- ☐ a CT Scan or similar testing
- ☐ a diagnosis other than those above
- ☒ other (please specify): See Attachment

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PART II: ASBESTOS-RELATED CONDITION(S) (Continued)



WR GRACE PIQ 010189-0011

2. Information Regarding Diagnosis

Date of Diagnosis: See Attachment

Diagnosing Doctor's Name:

Diagnosing Doctor's Specialty:

Diagnosing Doctor's Mailing Address:

Address

City State/Province Zip/Postal Code

Diagnosing Doctor's Daytime Telephone Number: (.....) - -

With respect to your relationship to the diagnosing doctor, check all applicable boxes:

Was the diagnosing doctor your personal physician? ☐ Yes ☒ NoWas the diagnosing doctor paid for the diagnostic services that he/she performed? ☒ Yes ☐ NoIf yes, please indicate who paid for the services performed: Costs Adv. by Atty.Did you retain counsel in order to receive any of the services performed by the diagnosing doctor? ☒ Yes ☐ NoWas the diagnosing doctor referred to you by counsel? ☒ Yes ☐ NoAre you aware of any relationship between the diagnosing doctor and your legal counsel? ☐ Yes ☐ No

If yes, please explain:

Was the diagnosing doctor certified as a pulmonologist or internist by the American Board of Internal Medicine at the time of the diagnosis? ☐ Yes ☒ NoWas the diagnosing doctor certified as a pathologist by the American Board of Pathology at the time of the diagnosis? ☐ Yes ☒ NoWas the diagnosing doctor provided with your complete occupational, medical and smoking history prior to diagnosis? ☐ Yes ☒ NoDid the diagnosing doctor perform a physical examination? ☐ Yes ☒ NoDo you currently use tobacco products? ☐ Yes ☒ NoHave you ever used tobacco products? ☐ Yes ☒ No

If answer to either question is yes, please indicate whether you have regularly used any of the following tobacco products and the dates and frequency with which such products were used:

☐ Cigarettes Packs Per Day (half pack = .5) Start Year End Year☐ Cigars Cigars Per Day Start Year End Year☐ If Other Tobacco Products, please specify (e.g., chewing tobacco):

Amount Per Day Start Year End Year

Have you ever been diagnosed with chronic obstructive pulmonary disease ("COPD")? ☐ Yes ☒ No

If yes, please attach all documents regarding such diagnosis and explain the nature of the diagnosis:

3. Information Regarding Chest X-Ray

Please check the box next to the applicable location where your chest x-ray was taken (check one):

☒ Mobile laboratory ☐ Job site ☐ Union Hall ☐ Doctor office ☐ Hospital ☐ Other:Address where chest x-ray taken: Mobile

Address

City

Pine Bluff

State/Province

Ark

Zip/Postal Code

PART II: ASBESTOS-RELATED CONDITION(S) (Continued)



WR GRACE PIQ 010189-0012

4. Information Regarding Chest X-Ray Reading

Date of Reading: ____/____/____ ILO score: ____

Name of Reader: See Attachment

Reader's Daytime Telephone Number: _____ (____) _____

Reader's Mailing Address: _____

Address

City _____ State/Province _____ Zip/Postal Code _____

With respect to your relationship to the reader, check all applicable boxes:

Was the reader paid for the services that he/she performed? ☒ Yes ☐ NoIf yes, please indicate who paid for the services performed: Costs Adv. by Attg.Did you retain counsel in order to receive any of the services performed by the reader? ☒ Yes ☐ NoWas the reader referred to you by counsel? ☒ Yes ☐ NoAre you aware of any relationship between the reader and your legal counsel? ☐ Yes ☐ No

If yes, please explain: _____

Was the reader certified by the National Institute for Occupational Safety and Health at the time of the reading?

☒ Yes ☐ No

If the reader is not a certified B-reader, please describe the reader's occupation, specialty, and the method through which the reading was made: _____

5. Information Regarding Pulmonary Function Test: _____ Date of Test: ____/____/____

List your height in feet and inches when test given: _____ ft _____ inches

List your weight in pounds when test given: See Attachment _____ lbs

Total Lung Capacity (TLC): _____ % of predicted

Forced Vital Capacity (FVC): _____ % of predicted

FEV1/FVC Ratio: _____ % of predicted

Name of Doctor Performing Test (if applicable): _____

Doctor's Specialty: _____

Name of Clinician Performing Test (if applicable): _____

Testing Doctor or Clinician's Mailing Address: _____

Address

City _____ State/Province _____ Zip/Postal Code _____

Testing Doctor or Clinician's Daytime Telephone Number: _____ (____) _____

Name of Doctor Interpreting Test: _____

Doctor's Specialty: _____

Interpreting Doctor's Mailing Address: _____

Address

City _____ State/Province _____ Zip/Postal Code _____

Interpreting Doctor's Daytime Telephone Number: _____ (____) _____

PART II: ASBESTOS-RELATED CONDITION(S) (Continued)

WR GRACE PIQ 010189-0013

With respect to your relationship to the doctor or clinician who performed the pulmonary function test check all applicable boxes:

If the test was performed by a doctor, was the doctor your personal physician? ☐ Yes ☒ No

Was the testing doctor and/or clinician paid for the services that he/she performed? ☒ Yes ☐ No

If yes, please indicate who paid for the services performed: Costs Adv. by AHJ

Did you retain counsel in order to receive any of the services performed by the testing doctor or clinician? ☐ Yes ☒ No

Was the testing doctor or clinician referred to you by counsel? ☒ Yes ☐ No

Are you aware of any relationship between either the doctor or clinician and your legal counsel? ☐ Yes ☐ No

If yes, please explain: _____

Was the testing doctor certified as a pulmonologist or internist by the American Board of Internal Medicine at the time of the pulmonary function test? ☒ Yes ☐ No

With respect to your relationship to the doctor interpreting the results of the pulmonary function test check all applicable boxes:

Was the doctor your personal physician? ☐ Yes ☒ No

Was the doctor paid for the services that he/she performed? ☒ Yes ☐ No

If yes, please indicate who paid for the services performed: Costs Adv. by AHJ

Did you retain counsel in order to receive any of the services performed by the doctor? ☐ Yes ☒ No

Was the doctor referred to you by counsel? ☒ Yes ☐ No

Are you aware of any relationship between the doctor and your legal counsel? ☐ Yes ☐ No

If yes, please explain: _____

Was the doctor interpreting the pulmonary function test results certified as a pulmonologist or internist by the American Board of Internal Medicine at the time the test results were reviewed? ☒ Yes ☐ No

6. Information Regarding Pathology Reports:

Date of Pathology Report: _____ / _____ / _____

Findings: _____

Name of Doctor Issuing Report: _____

Doctor's Specialty: _____

Doctor's Mailing Address: _____
Address

City _____ State/Province _____ Zip/Postal Code _____

Doctor's Daytime Telephone Number: _____ (____) _____ - _____

With respect to your relationship to the doctor issuing the pathology report, check all applicable boxes:

Was the doctor your personal physician? ☐ Yes ☐ No

Was the doctor paid for the services that he/she performed? ☐ Yes ☐ No

If yes, please indicate who paid for the services performed: _____

Did you retain counsel in order to receive any of the services performed by the doctor? ☐ Yes ☐ No

Was the doctor referred to you by counsel? ☐ Yes ☐ No

Are you aware of any relationship between the doctor and your legal counsel? ☐ Yes ☐ No

If yes, please explain: _____

Was the doctor certified as a pathologist by the American Board of Pathology at the time of the diagnosis?

☐ Yes ☐ No

PART II: ASBESTOS-RELATED CONDITION(S) (Continued)

WR GRACE PIQ 010189-0014

7. With respect to the condition alleged, have you received medical treatment from a doctor

☐ Yes ☒ No*If yes, please complete the following:*

Name of Treating Doctor: _____

Treating Doctor's Specialty: _____

Treating Doctor's Mailing Address: _____

Address

City

State/Province

Zip/Postal Code

Treating Doctor's Daytime Telephone number: _____ (____) _____ - _____

Was the doctor paid for the services that he/she performed? ☐ Yes ☐ No*If yes, please indicate who paid for the services performed:* _____Did you retain counsel in order to receive any of the services performed by the doctor? ☐ Yes ☐ No**[REMAINDER OF PAGE INTENTIONALLY BLANK]**

PART III: DIRECT EXPOSURE TO GRACE ASBESTOS-CONTAINING PRODUCTS

Please complete the chart below for each site at which you allege exposure to Grace asbestos-containing products. If you allege exposure at multiple sites, the Court has ordered that you must complete a separate chart for each site. For your convenience, additional copies of Part III are attached as Appendix D to this Questionnaire.

If exposure was in connection with your employment, use the list of occupation and industry codes in the Instructions to Part III to indicate your occupation and the industry in which you worked.

In the "Nature of Exposure" column, for each job listed, please indicate the letter(s) corresponding to whether you were any of the following during your exposure:

- (a) A worker who personally mixed Grace asbestos-containing products
 (d) A worker at a site where Grace asbestos-containing products were being installed, mixed, removed or cut by others
 (b) A worker who personally removed or cut Grace asbestos-containing products
 (e) A worker in a space where Grace asbestos-containing products were being installed, mixed, removed or cut by others
 (c) A worker who personally installed Grace asbestos-containing products
 (f) If other, please specify.

Site of Exposure: International Paper Location: Pre Bluff, AR

Site Name: _____

Site Type: ☐ Residence ☒ Business Site Owner: _____

Employer During Exposure: _____ Unions of which you were a member during your employment: _____

Job Description:	Product(s)	Basis for Identification of Each Grace Product	Dates and Frequency of Exposure (hours/day, days/year)	Occupation Code If Code 59, specify.	Industry Code If Code 118, specify.	Was exposure due to working in or around areas where product was being installed, mixed, removed, or cut? If Yes, please indicate your regular proximity to such areas	Nature of Exposure
Job 1 Description: <u>Econo-white</u>			<u>1988-1999</u>		<u>118</u>		<u>b, c</u>
Job 2 Description: <u>Pertex products</u>		<u>personal</u>		<u>59</u>	<u>paper mill</u>	<u>as installed & removed/replaced</u>	<u>b, c</u>
Job 3 Description: <u>Prep-Coats</u>		<u>TD</u>	<u>maintenance</u>			<u>plaster, mud, insulation</u>	
Job 4 Description: <u>Zonolite products</u>				<u>9</u>		<u>worked on boilers</u>	
Job 5 Description: <u>Block filler</u>				<u>10</u>			
Job 6 Description: <u>Vermiculite Plaster Bagged Zonolite</u>							



9 - Also worked on paper machines

PART IV: INDIRECT EXPOSURE TO GRACE ASBESTOS-CONTAINING



WR GRACE PIQ 010189-0016

1. Are you asserting an injury caused by exposure to Grace asbestos-containing products through contact/proximity with another injured person? ☐ Yes ☒ No

If yes, complete questions 2 through 10 of this section for each injured person through which you allege exposure to Grace asbestos-containing products. For your convenience, additional copies of Part IV are attached as Appendix E to this Questionnaire.

2. Please indicate the following information regarding the other injured person:

Name of Other Injured Person: _____ Gender: ☐ Male ☐ Female

Last Four Digits of Social Security Number: _____ Birth Date: ____/____/____

3. What is your Relationship to Other Injured Person: ☐ Spouse ☐ Child ☐ Other

4. Nature of Other Injured Person's Exposure to Grace Asbestos-Containing Products:

5. Dates Other Injured Person was Exposed to Grace Asbestos-Containing Products:

From: ____/____/____ To: ____/____/____

6. Other Injured Person's Basis for Identification of Asbestos-Containing Product as Grace Product:

7. Has the Other Injured Person filed a lawsuit related to his/her exposure? ☐ Yes ☐ No

If yes, please provide caption, case number, file date, and court name for the lawsuit:

Caption: _____

Case Number: _____ File Date: ____/____/____

Court Name: _____

8. Nature of Your Own Exposure to Grace Asbestos-Containing Product:

9. Dates of Your Own Exposure to Grace Asbestos-Containing Product:

From: ____/____/____ To: ____/____/____

10. Your Basis for Identification of Asbestos-Containing Product as Grace Product:

[REMAINDER OF PAGE INTENTIONALLY BLANK]

PART V: EXPOSURE TO NON-GRACE ASBESTOS-CONTAINING PRODUCTS

Please complete the chart below for each party against which you have filed a lawsuit and/or claim alleging exposure to asbestos-containing products other than Grace products. If you filed such lawsuits and/or claims against multiple parties, the Court has ordered that you must complete a separate chart for each party. For your convenience, additional copies of Part V are attached as Appendix F to this Questionnaire.

If exposure was in connection with your employment, use the list of occupation and industry codes in the Instructions to Part III to indicate your occupation and the industry in which you worked.

In the "Nature of Exposure" column, for each product listed, please indicate the letter(s) corresponding to whether you were any of the following during your exposure:

- (a) A worker who personally mixed Non-Grace asbestos-containing products
- (b) A worker who personally removed or cut Non-Grace asbestos-containing products
- (c) A worker who personally installed Non-Grace asbestos-containing products
- (d) A worker at a site where Non-Grace asbestos-containing products were being installed, mixed, removed or cut by others
- (e) A worker in a space where Non-Grace asbestos-containing products were being installed, mixed, removed or cut by others
- (f) If other, please specify.

Party Against which Lawsuit or Claim was Filed:

Product(s)	Dates and Frequency of Exposure (hours/day, days/year)	Occupation Code <i>If Code 59, specify.</i>	Industry Code <i>If Code 118, specify.</i>	Was exposure due to working in or around areas where product was being installed, mixed, removed, or cut? <i>If Yes, please indicate your regular proximity to such areas</i>	Nature of Exposure
Site of Exposure 1 Site Name: _____ Address: _____ City and State: _____ Site Owner: _____	Job 1 Description:				
	Job 2 Description:				
	Job 3 Description:				
Site of Exposure 2 Site Name: _____ Address: _____ City and State: _____ Site Owner: _____	Job 1 Description:				
	Job 2 Description:				
	Job 3 Description:				
Site of Exposure 3 Site Name: _____ Address: _____ City and State: _____ Site Owner: _____	Job 1 Description:				
	Job 2 Description:				
	Job 3 Description:				



PART VI: EMPLOYMENT HISTORY

WR GRACE PIQ 010189-0018

Other than jobs listed in Part III or V, please complete this Part VI for all of your prior industrial work experience up to and including your current employment. For each job, include your employer, location of employment, and dates of employment. Only include jobs at which you worked for at least one month. Please use the copy of Part VI attached as Appendix G to this Questionnaire if additional space is needed.

Occupation Code: _____ If Code 59, specify: _____

Industry Code: _____ If Code 118, specify: _____

Employer: _____

Beginning of Employment: ____/____/____ End of Employment: ____/____/____

Location: _____

Address

City

State/Province

Zip/Postal Code

Occupation Code: _____ If Code 59, specify: _____

Industry Code: _____ If Code 118, specify: _____

Employer: _____

Beginning of Employment: ____/____/____ End of Employment: ____/____/____

Location: _____

Address

City

State/Province

Zip/Postal Code

Occupation Code: _____ If Code 59, specify: _____

Industry Code: _____ If Code 118, specify: _____

Employer: _____

Beginning of Employment: ____/____/____ End of Employment: ____/____/____

Location: _____

Address

City

State/Province

Zip/Postal Code

Occupation Code: _____ If Code 59, specify: _____

Industry Code: _____ If Code 118, specify: _____

Employer: _____

Beginning of Employment: ____/____/____ End of Employment: ____/____/____

Location: _____

Address

City

State/Province

Zip/Postal Code

PART VII: LITIGATION AND CLAIMS REGARDING ASBESTOS AND/OR SILICA

WR GRACE PIQ 010189-0019

a. LITIGATION

1. Have you ever been a plaintiff in a lawsuit regarding asbestos or silica?..... ☒ Yes ☐ No

If yes, please complete the rest of this Part VII(a) for each lawsuit. For your convenience, additional copies of Part VII are attached as Appendix G to this Questionnaire

See Attachment

2. Please provide the caption, case number, file date, and court name for the lawsuit you filed:

Caption: _____

Case Number: _____ File Date: ____/____/____

Court Name: _____

3. Was Grace a defendant in the lawsuit? ☐ Yes ☐ No

4. Was the lawsuit dismissed against any defendant? ☐ Yes ☐ No

If yes, please provide the basis for dismissal of the lawsuit against each defendant:

5. Has a judgment or verdict been entered? ☐ Yes ☐ No

If yes, please indicate verdict amount for each defendant(s): _____

6. Was a settlement agreement reached in this lawsuit? ☐ Yes ☐ No

If yes and the settlement was reached on or after April 2, 2001, please indicate the following:

a. Settlement amount for each defendant: _____

b. Applicable defendants: _____

c. Disease or condition alleged: _____

d. Disease or condition settled (if different than disease or condition alleged): _____

7. Were you deposed in this lawsuit? ☐ Yes ☐ No

If yes and Grace was not a party in the lawsuit, please attach a copy of your deposition to this Questionnaire

b. CLAIMS

1. Have you ever asserted a claim regarding asbestos and/or silica, including but not limited to a claim against an asbestos trust (other than a formal lawsuit in court)? ☒ Yes ☐ No

If yes, please complete the rest of this Part VII(b). If no, please skip to Part VIII

See Attachment

2. Date the claim was submitted: ____/____/____

3. Person or entity against whom the claim was submitted: _____

4. Description of claim: _____

5. Was claim settled? ☐ Yes ☐ No

6. Please indicate settlement amount: \$ _____

7. Was the claim dismissed or otherwise disallowed or not honored? ☐ Yes ☐ No

If yes, provide the basis for dismissal of the claim: _____



WR GRACE PIQ 010189-0020

PART VIII: CLAIMS BY DEPENDENTS OR RELATED PERSONSName of Dependent or Related Person: _____ Gender: ☐ Male ☐ Female

Last Four Digits of Social Security Number: _____ Birth Date: ____/____/____

Financially Dependent: _____ ☐ Yes ☐ NoRelationship to Injured Party: ☐ Spouse ☐ Child ☐ Other If other, please specify _____Mailing Address: _____
Address

City _____ State/Province _____ Zip/Postal Code _____

Daytime Telephone number: _____ (____) _____

PART IX: SUPPORTING DOCUMENTATION

Please use the checklists below to indicate which documents you are submitting with this form.

Copies:

- ☒ Medical records and/or report containing a diagnosis
☒ Lung function test results
☒ Lung function test interpretations
☐ Pathology reports
☐ Supporting documentation of exposure to Grace asbestos-containing products
☐ Supporting documentation of other asbestos exposure

- ☐ X-rays
☒ X-ray reports/interpretations
☐ CT scans
☐ CT scan reports/interpretations
☐ Depositions from lawsuits indicated in Part VII of this Questionnaire
☐ Death Certification

Originals:

- ☐ Medical records and/or report containing a diagnosis
☐ Lung function test results
☐ Lung function test interpretations
☐ Pathology reports
☐ Supporting documentation of exposure to Grace asbestos-containing products

- ☐ Supporting documentation of other asbestos exposure
☐ X-rays
☐ X-ray reports/interpretations
☐ CT scans
☐ CT scan reports/interpretations
☐ Death Certification

Grace will reimburse your reasonable expenses incurred in providing (a) copies of depositions you have given in lawsuits in which Grace was not a party and/or (b) any documents you have previously provided to Grace in prior litigation. Please indicate the documents for which you are seeking reimbursement and attach a receipt for such costs:

PART X: ATTESTATION THAT INFORMATION IS TRUE AND ACCURATE

The information provided in this Questionnaire must be accurate and truthful. This Questionnaire is an official court document that may be used as evidence in any legal proceeding regarding your Claim. The penalty for presenting a fraudulent Questionnaire is a fine of up to \$500,000 or imprisonment for up to five years, or both. 18 U.S.C. §§ 152 & 3571.
TO BE COMPLETED BY THE INJURED PERSON.

I swear, under penalty of perjury, that, to the best of my knowledge, all of the foregoing information contained in this Questionnaire:

Signature: X

REDACTED

Date: 11/24/2005

Please Print Name: _____

TO BE COMPLETED BY THE LEGAL REPRESENTATIVE OF THE INJURED PERSON.

I swear that, to the best of my knowledge, all of the information contained in this Questionnaire is true, accurate and complete.

Signature: _____

Date: 12/13/2005Please Print Name: Anthony Sabatarios

REDACTED



WR GRACE PIQ 010189-0021

MORRIS, SAKALARIOS & BLACKWELL
A PROFESSIONAL LIMITED LIABILITY COMPANY

F. MARVIN MORRIS, III
ANTHONY SAKALARIOS
CHARLES G. BLACKWELL
*SARA MORRIS FARRIS

1817 Hardy Street 39401-4914
P.O. Drawer 1858 39403-1858
Hattiesburg, Mississippi
Telephone 601-544-3343
Facsimile 601-544-9814
Toll Free Number 888-716-2404
www.morris-sakalarios.com

STACEY LEA SIMS
SHAUN R. CADE
CHARLES G. BLACKWELL, JR.
NICHOLAS SAKALARIOS
*also admitted in Alabama

<i>Company Name</i>	<i>To Company</i>
Haliburton	6000
Narco	7
New Narco	10/25/04
48 Ins	05/29/03
CE	05/20/02
JM	06/19/01
Pfizer	10/5/05
Eagle	10/02/01
Shook Fletcher	02/13/02
CEL	08/21/01
BW	07/06/01
Congoleum	08/15/03
ACS	08/12/02



James W. Ballard, M.D.

3932 Knollwood Drive • Birmingham, AL 35243



NIOSH Certified B-Reader

X-RAY EVALUATION

February 14, 2001

Anthony Sakalarios
Morris, Sakalarios & Blackwell, PLLC
201 Hardy St.
Hattiesburg, MS 39401

Re:

REDACTED

SSN:

REDACTED

Chest radiograph(s) dated 01/26/01 is reviewed for the presence of and classification of pneumoconiosis according to the ILO 80 classification.

Film quality is grade 2 due to slight overexposure. Inspection of lung parenchyma demonstrates interstitial changes in the mid and lower lung zones bilaterally, consisting of small and irregular opacities of size and shape t/t, profusion I/O.

There are no pleural plaques or pleural calcifications. Pleural thickening is seen in the minor fissure. No parenchymal infiltrates, nodules or masses are seen. The heart is of normal size and the mediastinal structures are unremarkable.

CONCLUSION: The above parenchymal changes are consistent with asbestosis provided the subject's exposure history and period of latency are appropriate.

James W. Ballard, M.D.

James W. Ballard, M.D.

REDACTED



WR GRACE PIQ 010189-0023

WORKER'S Social Security Number

TYPE OF READING

A ☒ P

IDENTIFICATION

☐ ☐ ☐ ☐

1A. DATE OF X-RAY MONTH <input type="text" value="01"/> DAY <input type="text" value="26"/> YEAR <input type="text" value="01"/>	1B. FILM QUALITY If not Grade 1 Give Reason: 1 <input checked="" type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> U/R <input type="checkbox"/> <i>Slightly overexposed</i>	1C. IS FILM COMPLETELY NEGATIVE? YES <input type="checkbox"/> Proceed to Section 5 NO <input checked="" type="checkbox"/> Proceed to Section 2																																										
2A. ANY PARENCHYMAL ABNORMALITIES CONSISTENT WITH PNEUMOCONIOSIS? YES <input checked="" type="checkbox"/> COMPLETE 2B and 2C NO <input type="checkbox"/> Proceed to Section 3																																												
2B. SMALL OPACITIES a. SHAPE / SIZE PRIMARY <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>p</td><td>s</td></tr><tr><td>q</td><td>r</td></tr><tr><td>r</td><td>u</td></tr></table> SECONDARY <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>p</td><td>s</td></tr><tr><td>q</td><td>r</td></tr><tr><td>r</td><td>u</td></tr></table> b. ZONES <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td></td><td></td></tr><tr><td></td><td></td></tr><tr><td></td><td></td></tr></table> c. PROFUSION <table border="1" style="display: inline-table; vertical-align: middle;"> <tr><td>0/</td><td>00</td><td>01</td></tr> <tr><td>10</td><td>1/1</td><td>1/2</td></tr> <tr><td>2/1</td><td>2/2</td><td>2/3</td></tr> <tr><td>3/2</td><td>3/3</td><td>3/4</td></tr> </table>		p	s	q	r	r	u	p	s	q	r	r	u							0/	00	01	10	1/1	1/2	2/1	2/2	2/3	3/2	3/3	3/4	2C. LARGE OPACITIES SIZE <input checked="" type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C Proceed to Section 3												
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3/2	3/3	3/4																																										
3A. ANY PLEURAL ABNORMALITIES CONSISTENT WITH PNEUMOCONIOSIS? YES <input type="checkbox"/> COMPLETE 3B, 3C and 3D NO <input checked="" type="checkbox"/> Proceed to Section 4																																												
3B. PLEURAL THICKENING a. DIAPHRAGM (plaque) SITE <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>O</td><td>R</td><td>L</td></tr></table> b. COSTOPHRENIC ANGLE SITE <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>O</td><td>R</td><td>L</td></tr></table>	O	R	L	O	R	L	3C. PLEURAL THICKENING... Chest Wall a. CIRCUMSCRIBED (plaque) SITE <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>O</td><td>R</td></tr></table> IN PROFILE <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>O</td><td>A</td><td>B</td><td>C</td></tr></table> I. EXTENT <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>0</td><td>1</td><td>2</td><td>3</td></tr></table> FACE ON <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>0</td><td>1</td><td>2</td><td>3</td></tr></table> II. EXTENT <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>0</td><td>1</td><td>2</td><td>3</td></tr></table> b. DIFFUSE SITE <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>O</td><td>R</td></tr></table> IN PROFILE <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>O</td><td>A</td><td>B</td><td>C</td></tr></table> I. EXTENT <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>0</td><td>1</td><td>2</td><td>3</td></tr></table> FACE ON <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>0</td><td>1</td><td>2</td><td>3</td></tr></table> II. EXTENT <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>0</td><td>1</td><td>2</td><td>3</td></tr></table>		O	R	O	A	B	C	0	1	2	3	0	1	2	3	0	1	2	3	O	R	O	A	B	C	0	1	2	3	0	1	2	3	0	1	2	3
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3D. PLEURAL CALCIFICATION SITE <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>O</td><td>R</td></tr></table> EXTENT <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>0</td><td>1</td><td>2</td><td>3</td></tr></table> a. DIAPHRAGM <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>0</td><td>1</td><td>2</td><td>3</td></tr></table> b. WALL <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>0</td><td>1</td><td>2</td><td>3</td></tr></table> c. OTHER SITES <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>0</td><td>1</td><td>2</td><td>3</td></tr></table> Proceed to Section 4			O	R	0	1	2	3	0	1	2	3	0	1	2	3	0	1	2	3																								
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4A. ANY OTHER ABNORMALITIES? YES <input checked="" type="checkbox"/> COMPLETE 4B and 4C NO <input type="checkbox"/> Proceed to Section 5																																												
4B. OTHER SYMBOLS (OBLIGATORY) <table border="1" style="width:100%; text-align: center;"> <tr> <td>O</td><td>ax</td><td>bu</td><td>ca</td><td>ch</td><td>co</td><td>cp</td><td>cv</td><td>di</td><td>ef</td><td>em</td><td>es</td><td>fr</td><td>hl</td><td>ho</td><td>ld</td><td>ln</td><td>ll</td><td>px</td><td>rp</td><td>tb</td> </tr> </table> (SPECIFY ed.) <input type="text" value="OD"/> Report items which may be of present clinical significance in this section. Date Personal Physician notified? MONTH <input type="text" value="02"/> DAY <input type="text" value="14"/> YR <input type="text" value="01"/>			O	ax	bu	ca	ch	co	cp	cv	di	ef	em	es	fr	hl	ho	ld	ln	ll	px	rp	tb																					
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4C. OTHER COMMENTS <div style="border: 1px solid black; height: 40px; margin-top: 5px;"></div>																																												
SHOULD WORKER SEE PERSONEL PHYSICIAN BECAUSE OF COMMENTS IN SECTION 4C. YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> Proceed to Section 5																																												

5. FILM READER'S INITIALS

JWB

PHYSICIAN'S SOCIAL SECURITY NUMBER*

417503115

DATE OF READING

MONTH DAY YR
 Complete if
 social
 security
 number is
 not
 furnished:

NAME (LAST-FIRST-MIDDLE)

STREET ADDRESS

CITY

STATE

ZIP CODE

*Furnishing your social security number is voluntary. Your refusal to provide this number will not affect your right to participate in this program.

**Asbestos Medical Evaluation****Dr. Gregory A. Nayden**
Board Certified in Internal Medicine

REDACTED

SSN: .

May 22, 2001

History:

Occupational: is a 63 year old who reports exposure to asbestos material from 1958 through 1999. He was exposed while working around gaskets, valve packing, furnaces, boilers, firebrick, gloves, insulation, and overhead piping insulated with asbestos as a paper mill worker, laborer, in the power house, and in maintenance. He also worked alongside pipefitters, boilermakers, and insulators. He complains of shortness of breath with exertional activities such as climbing stairs and dry cough, but denies chest pain. He has no prior smoking history.

Past Medical: None.

Physical Exam: The patient is normal appearing for stated age and is alert, oriented, and in no apparent respiratory distress. The chest is normal. The lungs are clear to auscultation. The heart has a regular rhythm with no murmurs or gallops. The fingers show no clubbing or cyanosis, and the ankles show no edema.

Pulmonary Function Testing: Performed 05/22/2001 utilizing Crapo/Hsu predicted values for spirometry, lung volumes, and diffusion.

FVC = 3.44L (91% predicted)

TLC = 4.93L (85% predicted)

FEV1 = 2.65L (88% predicted)

DLCO mL/mmHg/min = 21.3(77% predicted)

FEV1/FVC = 77%

DLCO/VA l/min/mmHg = 3.41(69% predicted)

These values are consistent with a mild obstructive defect and a mild reduction of diffusing capacity.

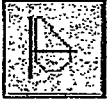
Chest Radiography: CXR dated 01/26/2001 was evaluated by Dr. James Ballard on 02/14/2001 and revealed irregular interstitial opacities in both mid and lower lung zones, the size and shape of which are classified as t/t and the profusion of 1/0. The pleural surfaces are normal.

Diagnostic Impression:

1. Bilateral interstitial fibrotic changes consistent with pulmonary asbestosis.
2. Given the asbestos exposure history, pulmonary function testing, and physical examination results, I concur with the NIOSH B-Readers radiographic evaluation.

Prognosis/Recommendations: Due to the latency period between exposure to asbestos and the proof of clinically significant asbestos-related disease, patients have an increased risk of developing bronchogenic carcinoma, mesothelioma, and other cancers, as well as the further deterioration in pulmonary function, even in the absence of additional asbestos exposure, therefore close clinical follow-up is recommended.

G. Nayden
Dr. Gregory A. Nayden



AMERICAN MEDICAL TESTING INC.
4324 N MOST DR. MOBILE AL 36609



Name: REDACTED

Gender: Male

Age: 63 Race: Caucasian

Height(in): 64 Weight(lb): 196

Any Info:

Id: PA-53

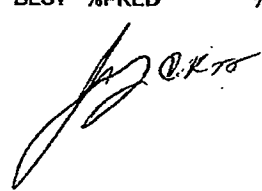
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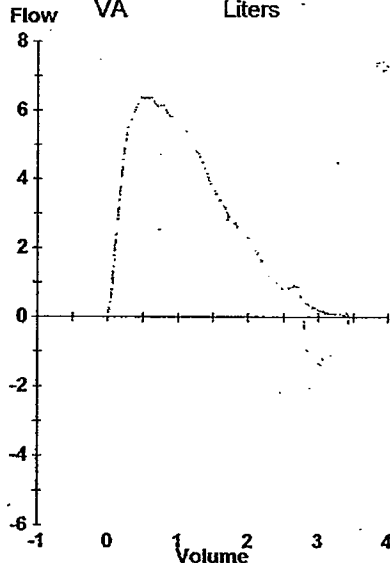
Date: 05/22/01

Temp: 21 PBar: 762

Physician: NAYDEN

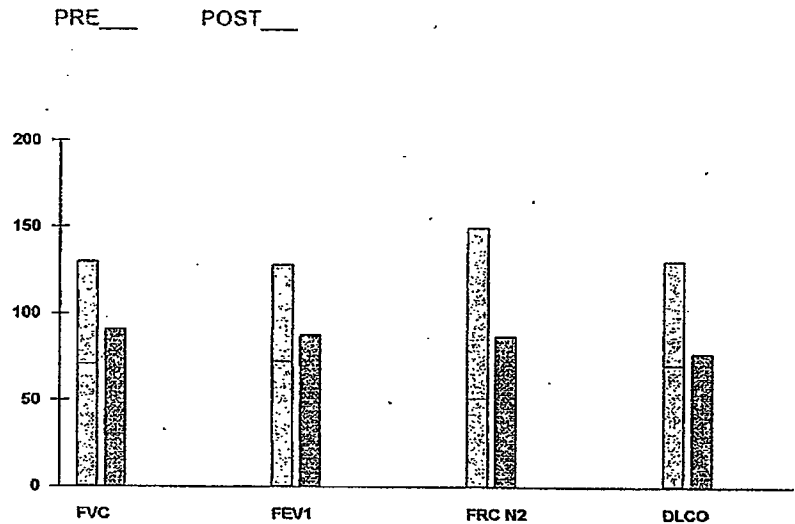
Technician: John McMurry CRTT

Spirometry (BTPS)		PRED	PRE-RX		POST-RX		% Chg
			BEST	%PRED	BEST	%PRED	
FVC	Liters	3.78	3.44	91			
FEV1	Liters	3.02	2.65	88			
FEV1/FVC	%	80	77				
FEF25-75%	L/sec	3.06	2.26	74			
FEF50%	L/sec		2.97				
PEF	L/sec		6.37				
MVV	L/min						
<div style="text-align: center;">  REDACTED </div>							
Lung Volumes (BTPS)							
TLC	Liters	5.83	4.93	85			
RV	Liters	1.98	1.49	75			
RV/TLC	%	34	30				
FRC N2	Liters	2.97	2.58	87			
VC	Liters	3.78	3.44	91			
Diffusion							
DLCO	mL/mmHg/min	27.7	21.3	77			
DL Adj	mL/mmHg/min	27.7	21.3	77			
DLCO/VA	mL/mHg/min/L	4.94	3.41	69			
DLVA Adj	mL/mHg/min/L		3.41				
VA	Liters		6.26				



Comments:

Interpretation:



AMERICAN MEDICAL TESTING INC.
4324 MIDMOST DR. MOBILE AL 36609



WR GRACE PIQ 010189-0026

Date: 05/22/01

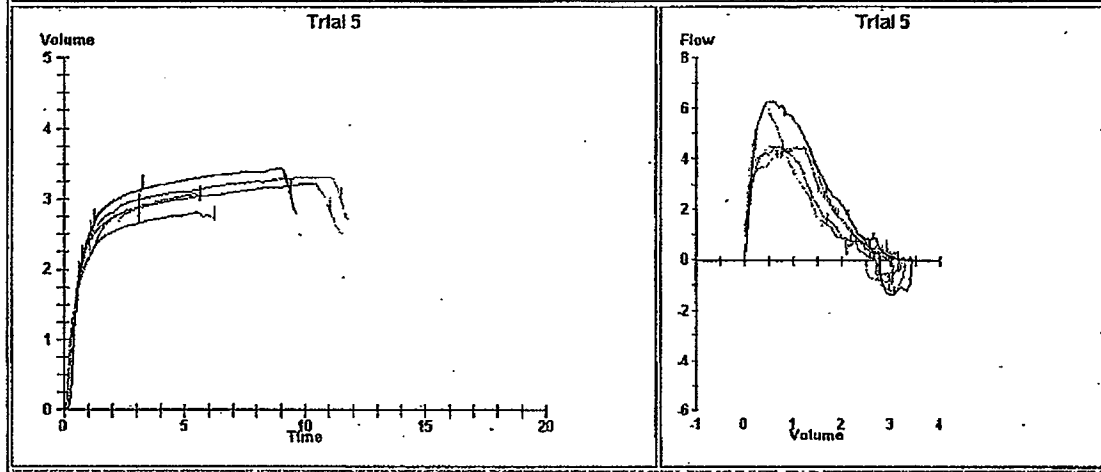
Pre

REDACTED

Flow Volume Loop --

- PA-53

	Ref	Best	% Ref	1	2	3	4	5
FVC	3.78	3.44	91	3.06	3.21	2.80	3.30	3.44
FEV1	3.02	2.65	88	2.43	2.10	2.18	2.47	2.65
FEV1/FVC	80	77		79	68	78	75	77
FEF25-75%	3.06	2.26	74	2.35	1.41	2.06	2.02	2.26
PEF		6.37		4.52	6.15	4.46	4.55	6.37



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AMERICAN MEDICAL TESTING INC.
4324 MIDMOST DR. MOBIL AL. 36609



Date: 05/22/01

Pre

REDACTED

Flow Volume Loop

- PA-53

	Ref	Best	% Ref	1	2	3	4	5
FVC	3.78	3.44	91	3.06	3.21	2.80	3.30	3.44
FEV1	3.02	2.65	88	2.43	2.18	2.18	2.47	2.65
FEV1/FVC	80	77		79	68	78	75	77
FEV3/FVC	93	91		94	89	95	91	91
FET100%		8.87		5.42	10.44	5.99	11.10	8.87
FEF25-75%	3.06	2.26	74	2.35	1.41	2.06	2.02	2.26
FEF25%		6.01		4.32	4.71	4.37	4.44	6.01
FEF50%		2.97		2.95	1.55	2.66	2.74	2.97
FEF75%		0.84		0.86	0.78	0.47	0.66	0.84
PEF		6.37		4.52	6.15	4.46	4.55	6.37
FVL ECode		000000		011	000	011	000	000
FIVC	3.78	0.65	17	0.13	0.72	0.13	0.60	0.65
PIF		1.38		0.99	0.88	0.64	1.24	1.38
FEF/FIF50		2.19		3.68	1.84	4.65	2.30	2.19

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AMERICAN MEDICAL TESTING INC.
4324 MIDMOST DR. MOBILE AL. 36609



WR GRACE PIQ 010189-0028

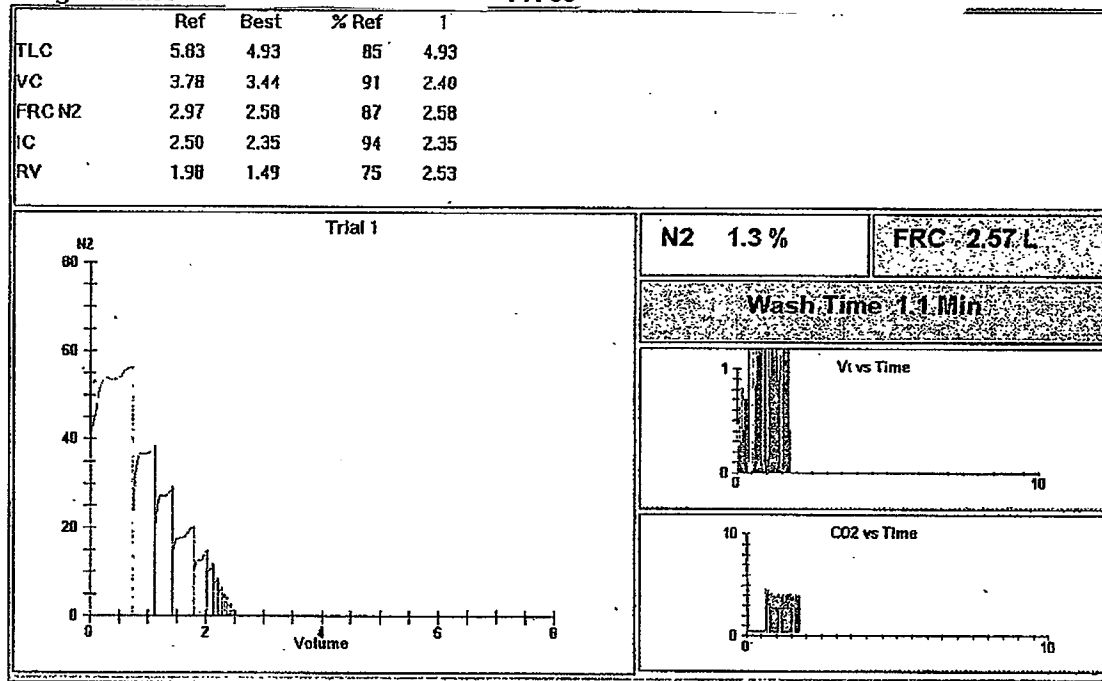
Date: 05/22/01

Pre

REDACTED

Lung Volumes —

- PA-53



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AMERICAN MEDICAL TESTING INC.
4324 MIDMOST DR. MOBILE AL 36609



WR GRACE PIQ 010189-0029

Date: 05/22/01

Pre

REDACTED

Lung Volumes — 7

PA-53

	Ref	Best	% Ref	1
TLC	5.83	4.93	85	4.93
VC	3.78	3.44	91	2.40
FRCN2	2.97	2.58	87	2.58
IC	2.50	2.35	94	2.35
ERV	1.25	0.05	4	0.05
RV	1.98	1.49	75	2.53
RV/TLC	34	30		51
LCI		6.23		6.23
Wash Time		1.1		1.1
LVol ECode		000000		00
VE	7.6	9.6	126	9.6
Vt		0.71		0.71
f		13		13
LVol Time		15:23		15:23
LVol Date		05/22		05/22

AMERICAN MEDICAL TESTING INC.
4324 MIDMOST DR. MOBILE AL. 36609



Date: 05/22/01

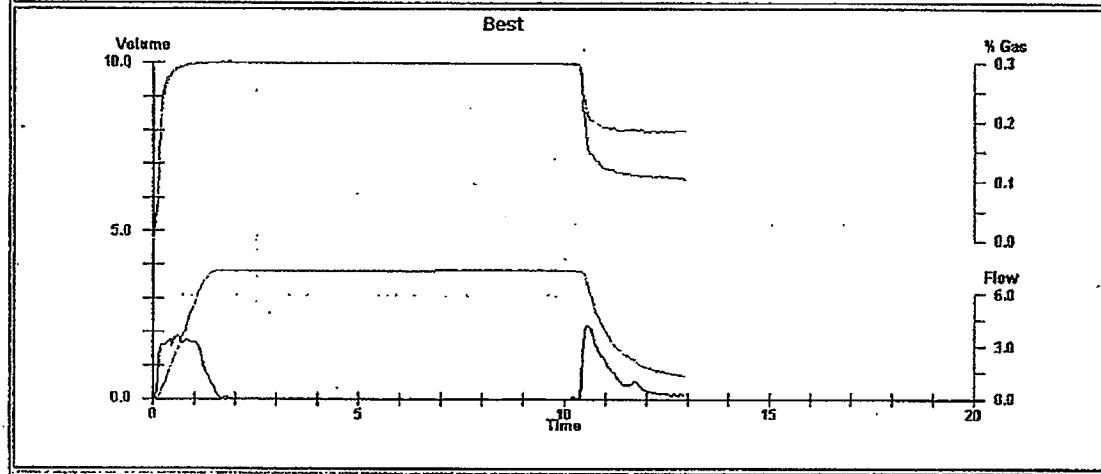
Pre

REDACTED

Single Breath DLCO —

- PA-53

	Ref	Best	% Ref	1	2
DLCO	27.7	21.3	77	20.6	22.0
DL Adj	27.7	21.3	77	20.6	22.0
IVC		3.74		3.65	3.83
VA		6.26		6.47	6.05
DLVA Adj		3.41		3.19	3.64



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AMERICAN MEDICAL TESTING INC.
4324 MIDMOST DR. MOBILE AL. 36609



WR GRACE PIQ 010189-0031

Date: 05/22/01

Pre

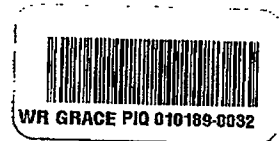
REDACTED

Single Breath DLCO

PA-53

	Ref	Best	% Ref	1	2
DLCO	27.7	21.3	77	20.6	22.0
DL Adj	27.7	21.3	77	20.6	22.0
DLCO/VA	4.94	3.41	69	3.19	3.64
DL/VA Adj		3.41		3.19	3.64
IVC		3.74		3.65	3.83
VA		6.26		6.47	6.05
BHT		10.61		10.67	10.56
FI CH4		0.300		0.300	0.300
FE CH4		0.169		0.159	0.179
FI CO		0.300		0.300	0.300
FE CO		0.100		0.097	0.103
DLCO ECode		0000		000	000
DLCO Date		05/22		05/22	05/22
DLCO Time		15:30		15:30	15:34

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
W. R. GRACE & CO., et al.)	Case No. 01-01139 (JKF)
)	Jointly Administered
Debtors.)	
)	

**Claimant's Responses and Objections to
W. R. Grace Asbestos Personal Injury Questionnaire**

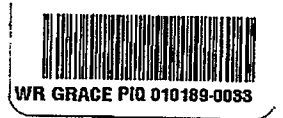
Pursuant to the Federal Rules of Civil Procedure, the Claimant, provides the following
Response and Objection to the Debtor's Asbestos Personal Injury Questionnaire:

Preliminary Statement and General Objections

The Claimant incorporates herein, as if copied in full, claimant's completed Asbestos
Personal Injury Questionnaire.

The Claimant's Response to each question incorporates this Preliminary Statement and
the following General Objections:

1. The Claimant objects to these questions to the extent that they seek information
subject to the attorney-client privilege or which constitutes protected work
product.
2. The Claimant objects to any discovery request that purports to impose upon it any
obligation not expressly set forth in the Federal Rules of Civil Procedure.
3. The Claimant objects to any discovery request to the extent that the time period(s)
referenced therein is/are not limited in scope.
4. The Claimant objects to any discovery request to the extent it seeks to require



Claimant to provide information which is equally available to the Defendant.

5. The Claimant objects to any discovery request to the extent that it seeks disclosure of information generated by persons other than the Claimant or the Claimant's counsel that has come into the possession of the Claimant or Claimant's counsel during the course of discovery and trial preparation in asbestos-related litigation.
6. The Claimant objects to any discovery request to the extent that it improperly calls for a legal, medical or scientific opinion or conclusion which Claimant is not qualified to render.
7. The Claimant does not concede that any response to any discovery request is or will be admissible evidence at any hearing regarding this action.

Without waiving any of the foregoing General Objections, which are incorporated by reference in each of the following responses, the Claimant states as follows:

Part II. Asbestos-Related Condition(s)

1. Claimant objects to this Question as Rule 33 specifically authorizes a party to produce documents from which the interrogatory may be answered in lieu of answering the interrogatories where "the burden of deriving the answer is substantially the same for the party serving the interrogatory as the party served."
 2. Claimant objects to this Question as Rule 33 specifically authorizes a party to produce documents from which the interrogatory may be answered in lieu of answering the interrogatories where "the burden of deriving the answer is substantially the same for the party serving the interrogatory as the party served."
- Claimant objects to the term "diagnosing doctor" in that said term is not defined.



Without waiving objection, the plaintiff would state that the Date of Diagnosis, Diagnosing Doctor's Name, Diagnosing Doctor's Specialty, Mailing Address and Daytime Telephone Number (if known) is located on the Medical Record attached hereto.

Further, Claimant objects to the term "relationship" as being vague and undefined. Claimant and his/her counsel are unable to determine the intended connotation; therefore, claimant is unable to respond to this question. Without waiving said objection, claimant and his/her counsel are not related by blood or marriage to any diagnosing doctor.

Claimant objects to the term "complete" as being vague and undefined.

Claimant and/or his/her counsel were unable to determine the intended connotation of said phrase; thus, claimant literally interpreted said phrase.

Accordingly, each claimant responded "No" because a complete occupational history and medical history would have included irrelevant information which was not provided such as employment and medical history unrelated to asbestos.

Finally, Claimants objects to the term "all" as being overly broad, unduly burdensome, and oppressive. The response to this request would impose unnecessary and unreasonable costs on the claimant. The materials being requested by Grace are beyond the possession, custody or control of the claimant and the burden of obtaining the information in response to this request is the same for the debtor as it is for the claimant.

4. Claimant objects to this Question as Rule 33 specifically authorizes a party to



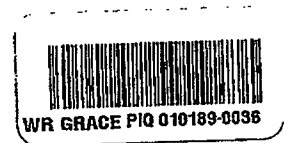
produce documents from which the interrogatory may be answered in lieu of answering the interrogatories where "the burden of deriving the answer is substantially the same for the party serving the interrogatory as the party served."

The Date of the Reading, ILO Score, Name of Reader, Reader's Daytime Telephone Number (if known), and Mailing Address may be located on the medical records attached.

The Date of the Reading, ILO Score, Name of Reader, Reader's Daytime Telephone Number (if known), and Mailing Address may be located on the medical records attached.

Further, Claimant objects to the term "relationship" as being vague and undefined. Claimant and his/her counsel are unable to determine the intended connotation; therefore, claimant is unable to respond to this question. Without waiving said objection, claimant and his/her counsel are not related by blood or marriage to any diagnosing doctor.

5. Claimant objects to this Question as Rule 33 specifically authorizes a party to produce documents from which the interrogatory may be answered in lieu of answering the interrogatories where "the burden of deriving the answer is substantially the same for the party serving the interrogatory as the party served." The information requested is located on the medical records attached. Further, Claimant objects to the term "relationship" as being vague and undefined. Claimant and his/her counsel are unable to determine the intended connotation; therefore, claimant is unable to respond to this question. Without waiving said



objection, claimant and his/her counsel are not related by blood or marriage to any diagnosing doctor.

6. Claimant objects to this Question as Rule 33 specifically authorizes a party to produce documents from which the interrogatory may be answered in lieu of answering the interrogatories where "the burden of deriving the answer is substantially the same for the party serving the interrogatory as the party served." The information requested is located on the medical records attached where applicable.

Further, Claimant objects to the term "relationship" as being vague and undefined. Claimant and his/her counsel are unable to determine the intended connotation; therefore, claimant is unable to respond to this question. Without waiving said objection, claimant and his/her counsel are not related by blood or marriage to any diagnosing doctor.

Part III: Direct Exposure to Grace Asbestos-Containing Products

Claimant objects to this request as being unduly burdensome and oppressive.

Further said request is vague and ambiguous as to the term "any and all documents establishing exposure." Finally, Claimant objects to responding to said questions when the Asbestos Claimants Committee has served substantial discovery on Grace asking for their historical exposure records and product records and Grace has objected to the production of same. Without waiving said objections, see claimant's response located on page nine.

Part V: Exposure to Non-Grace Asbestos-Containing Products



Claimant objects to this request as being unduly burdensome and oppressive.

Claimant objects to this request in that the Fed. R. of Civ. P. limit the number of questions to 30. Further, Claimant objects to this request in that the scope of discovery is limited to matters that are relevant. Further, the debtor had ample opportunity by discovery ongoing in the original actions to obtain the information sought. Finally, claimant objects to this request as "the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the importance of the issues at stake in the litigation, and the importance of the proposed discovery in resolving the issue." Without waiving said objection, claimant's counsel has filed the following cases on behalf of its clients:

Ray H. Beasley, et al., v. Goulds Pump Trading Corporation, et al, Circuit Court of Forrest County, Mississippi, Civil Action No. CI02-0303.

Harold Wilborn, et al., v. Alstom Power, Inc., et al., Circuit Court of Forrest County, Mississippi, Civil Action No. CI02-0310.

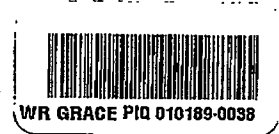
Eleanor R. Archey, et al., v. Ingersoll Rand Company, Circuit Court of Jones County, Mississippi, Second Judicial District, Civil Action No. 2002-228-CV7.

Marvin L. Davis, et al, v. Amchem Products, Inc., et al, Circuit Court of Forrest County, Mississippi, Civil Action No. CI02-0258.

Henry Byrd, et al., v. The Flintkote Company and Zurn Industries; Circuit Court of Forrest County, Mississippi, Civil Action No. CI-99-0246.

Marion C. Bentley et al. v. Crane Co., et al.
Circuit Court of Newton County, Mississippi; Civil Action No.04-CV-219NWC

Claude Rhines, et al., v. A. O. Smith, et al.
Circuit Court of Covington County, Mississippi; Civil Action No. 2002-



191C

Emery Burch, et al. v. A. O. Smith, et al.

Circuit Court of Jones County, Mississippi; First Judicial District; Civil Action No. 2002-90-CV12

Palmer Fletcher, et al., v. A. O. Smith, et al.

Circuit Court of Humphreys County, Mississippi; Civil Action No. 2002-0162;

Michael R. Flynn, et al., v. ACCO Chain & Lifting, et al

Second Judicial District, Jones County, Mississippi; Civil Action No. 2002-144-CV4;

Bobby G. Hall, et al., v. A. O. Smith, et al.

Circuit Court of Adams County, Mississippi; Civil Action No. 02-KV-0817-J

Estate of Charles Holder, et al v. Westinghouse Electric Corporation, et al

Circuit Court of Jones County, Mississippi; Second Judicial District; Civil Action No. 2000-134-CV8

Charles W. Irby, et al., v. A-Bex Corporation, et al

Second Judicial District of the Circuit Court of Jones County, Mississippi; Civil Action No.: 2002-31-CV1

Edward Jones, et al. vs. A. O. Smith, et al.,

Circuit Court of Jasper County, Mississippi; First Judicial District; Civil Action No. 12-0148

Wendell R. Lambert, et al., v. A. O. Smith, et al.

Circuit Court of Lawrence County, Mississippi; Civil Action No. 2002-0105

Fred Newsom, v. . A. O. Smith, et al.

Circuit Court of Lawrence County, Mississippi; Civil Action No. 2004-0144E

Originally filed in and severed and transferred from:

Wendell R. Lambert, et al., v. *A. O. Smith, et al.*

Circuit Court of Lawrence County, Mississippi; Civil Action No. 2002-0105



Samuel McDuffey, v. A. O. Smith, et al.

Circuit Court of Lawrence County, Mississippi; Civil Action No. 2004-0143E

Originally filed in and severed and transferred from:

Wendell R. Lambert, et al., v. *A. O. Smith, et al.*

Circuit Court of Lawrence County, Mississippi; Civil Action No. 2002-0105

Robert E. Pitts, et al. v. Metropolitan Life Insurance Company, et al.

Circuit Court of Jones County, Mississippi, Second Judicial District ; Civil Action No. 2001-3-CV1

Paul Touchstone, et al., v. A-Bex Corporation, et al

Second Judicial District, Jones County, Mississippi; Civil Action No. 2002-2-CV1

Ronald Adams v. Alco Industries, et al.

In the United States District Court For the Southern District of Mississippi Southern Division ; Civil Action No. 1:04CV730GRo

John Alamia, et al. v. A. O. Smith, et al.

Asbestos Products Liability Litigation (No. VI); Civil Action No. MDL 875

United States District Court for the Southern District of Mississippi, Southern Division

Civil Action No. 1:04CV750Gro

originally filed in and severed and transferred from:

Emery Burch, et al. v. *A. O. Smith, et al.*

Circuit Court of Jones County, Mississippi; First Judicial District; Civil Action No.2002-90-CV12

Aminte Defore, et al. v. A.O. Smith, et al.;

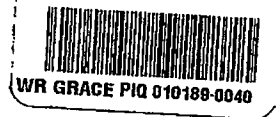
Asbestos Products Liability Litigation (No. VI); Civil Action No. MDL 875

In the United States District Court for the Southern District of Mississippi, Southern Division; Civil Action No. 1:04CV656GRo;

originally filed in and severed and transferred from:

Edward Jones, et al v. A. O. Smith, et al;

In the Circuit Court of Jasper County, Mississippi, ; Civil Action No. 12-0148



Ben Dickens, et al. v. A. R. Wilfley & Sons, et al.;
Asbestos Products Liability Litigation (No. VI); Civil Action No. MDL
875
In the United States District Court for the
Southern District of Mississippi, Southern Division; Civil Action No.
1:04cv641WJG;
originally filed in and severed and transferred from:
Estate of Charles Holder, et al v. Westinghouse Electric Corporation, et al
Circuit Court of Jones County, Mississippi; Second Judicial District; Civil
Action No. 2000-134-CV8

Ora Aaron, et al. v. A. R. Wilfley & Sons, et al.;
Asbestos Products Liability Litigation (No. VI); Civil Action No. MDL
875
In the United States District Court for the
Southern District of Mississippi, Southern Division; Civil Action No.
1:04cv603WJG;
originally filed in and severed and transferred from:
Claude Rhines, et al., v. *A. O. Smith, et al.*
Circuit Court of Covington County, Mississippi; Civil Action No. 2002-
191C

Bobby L. Clark, et al., v. A.W. Chesterton, et al.
Circuit Court of Hinds County, Action No. 251-04-000836-CIV

Roy Barry, et al., v. A.O. Smith, et al.
In the United States District Court for the Southern District of Mississippi
Southern Division; Civil Action No. 1:04CV731GRo

Hubert D. Stuart, et al., v. A.O. Smith, et al
Circuit Court of Hinds County, Mississippi; First Judicial District
Civil Action No. 251-04-244

Paul Brumfield, et al. v. A-Bex Corporation, et al.
In the Circuit Court of Jones County, Mississippi, Second Judicial District
Civil Action No. 2004-253CV12
originally filed in and severed and transferred from:
Paul Touchstone, et al., v. A-Bex Corporation, et al
Second Judicial District, Jones County, Mississippi; Civil Action No.
2002-2-CV1



Harold J. Anderson, et al., v. Goulds Pump Trading Corporation, et al.
Circuit Court of Forrest County, Mississippi, Civil Action No. CI02-0303

Frank Bankston, et al v. Westinghouse Electric Corporation, et al.,
United States District Court, Southern District of Mississippi,
Southern Division, Civil Action No. 1:01CV162GR

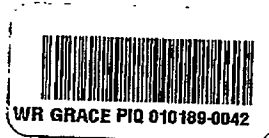
Jack Chandler v. American Cyanamid Co., et al.
In the Circuit Court of Jones County, Mississippi; Second Judicial District
Civil Action No. 2005-50-CV3
originally filed in and severed and transferred from:
Estate of Charles Holder, et al v. Westinghouse Electric Corporation, et al
Circuit Court of Jones County, Mississippi; Second Judicial District; Civil
Action No. 2000-134-CV8

Archie W. Courtney v. Acco Chain & Lifting, et al.
In the Circuit Court of Jones County, Mississippi, Second Judicial District
Civil Action No. 2004-219-CV9
originally filed in and severed and transferred from:
Michael R. Flynn, et al., v. ACCO Chain & Lifting, et al
Second Judicial District, Jones County, Mississippi; Civil Action No.
2002-144-CV4;

Thurman Ferguson, v. Circuit Court of Adams County, Mississippi; Civil
Action No. 02-KV-0817-J
originally filed in and severed and transferred from:
Bobby G. Hall, et al., v. A. O. Smith, et al.
Circuit Court of Adams County, Mississippi; Civil Action No. 02-KV-
0817-J

Donald Dunaway, v. A.O. Smith, et al; Circuit Court of Forrest County,
Mississippi; Civil Action No. CI-05-0022
originally filed in and severed and transferred from:
Claude Rhines, et al., v. A. O. Smith, et al.
Circuit Court of Covington County, Mississippi; Civil Action No. 2002-
191C

J. C. Butler, v. A. O. Smith, et al.
Circuit Court of Lawrence County, Mississippi; Civil Action No. 2004-
0141E
Originally filed in and severed and transferred from:
Wendell R. Lambert, et al., v. A. O. Smith, et al.
Circuit Court of Lawrence County, Mississippi; Civil Action No. 2002-
0105



Willie Funches, v. A. O. Smith, et al.

Circuit Court of Lawrence County, Mississippi; Civil Action No. 2004-0142E

Originally filed in and severed and transferred from:

Wendell R. Lambert, et al., v. *A. O. Smith, et al.*

Circuit Court of Lawrence County, Mississippi; Civil Action No. 2002-0105

James Parish v. American Standard, Inc., et al.

In the Circuit Court of Jones County, Mississippi; Second Judicial District
Civil Action No. 2005-51-CV3

originally filed in and severed and transferred from:

Estate of Charles Holder, et al v. Westinghouse Electric Corporation, et al

Circuit Court of Jones County, Mississippi; Second Judicial District; Civil
Action No. 2000-134-CV8

Faye E. Hamilton, etc. v. Allen-Bradley Co., et al.

United States District Court, Southern District, Southern Division

Civil Action No. 1:04CV732Gro

Henry T. Ray v. Acco Chain & Lifting, et al.

In the Circuit Court of Jones County, Mississippi, Second Judicial District
Civil Action No. 2004-218-CV9

originally filed in and severed and transferred from:

Michael R. Flynn, et al., v. ACCO Chain & Lifting, et al

Second Judicial District, Jones County, Mississippi; Civil Action No.
2002-144-CV4;

Charles Shannon, Jr. v. Acco Chain & Lifting, et al.

In the Circuit Court of Jones County, Mississippi, Second Judicial District
Civil Action No. 2004-220-CV9

originally filed in and severed and transferred from:

Michael R. Flynn, et al., v. ACCO Chain & Lifting, et al

Second Judicial District, Jones County, Mississippi; Civil Action No.
2002-144-CV4;

Larry Thigpen v. Acco Chain & Lifting, et al.

In the Circuit Court of Jones County, Mississippi, Second Judicial District
Civil Action No. 2004-221-CV9

originally filed in and severed and transferred from:

Michael R. Flynn, et al., v. ACCO Chain & Lifting, et al

Second Judicial District, Jones County, Mississippi; Civil Action No.
2002-144-CV4;



Thomas Wilson v. Westinghouse Electric Corporation, et al
Circuit Court of Perry County, Mississippi
Civil Action No. 2004-0027CI
originally filed in and severed and transferred from:
Estate of Charles Holder, et al v. Westinghouse Electric Corporation, et al
Circuit Court of Jones County, Mississippi; Second Judicial District; Civil
Action No. 2000-134-CV8

Debtor can obtain copies all pleadings, documents and orders filed regarding said claimant by reviewing said court files. Further, to the extent, claimant has responded to written discovery or been deposed and plaintiff and/or his counsel has copies of same, said information is being attached. Finally, claimant's additional work history is set forth in Part VI.

Part VII: Litigation and Claims Regarding Asbestos and/or Silicia

a. Claimant objects to this request as being unduly burdensome and oppressive. Claimant objects to this request in that the Fed. R. of Civ. P. limit the number of questions to 30. Further, Claimant objects to this request in that the scope of discovery is limited to matters that are relevant. Further, the debtor had ample opportunity by discovery ongoing in the original actions to obtain the information sought. Finally, claimant objects to this request as "the burden or expense of the proposed discovery outweighs its likely benefit, taking into account the needs of the case, the importance of the issues at stake in the litigation, and the importance of the proposed discovery in resolving the issue." Without waiving said objection, claimant's counsel has filed the following cases on behalf of its clients:

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Harold Wilborn, et al., v. Alstom Power, Inc., et al., Circuit Court of Forrest County, Mississippi, Civil Action No. CI02-0310.



Eleanor R. Archey, et al., v. Ingersoll Rand Company, Circuit Court of Jones County, Mississippi, Second Judicial District, Civil Action No. 2002-228-CV7.

Marvin L. Davis, et al, v. Amchem Products, Inc., et al, Circuit Court of Forrest County, Mississippi, Civil Action No. CI02-0258.

Henry Byrd, et al., v. The Flintkote Company and Zurn Industries; Circuit Court of Forrest County, Mississippi, Civil Action No. CI-99-0246.

Marion C. Bentley et al. v. Crane Co., et al.
Circuit Court of Newton County, Mississippi; Civil Action No.04-CV-219NWC

Claude Rhines, et al., v. A. O. Smith, et al.
Circuit Court of Covington County, Mississippi; Civil Action No. 2002-191C

Emery Burch, et al. v. A. O. Smith, et al.
Circuit Court of Jones County, Mississippi; First Judicial District; Civil Action No.2002-90-CV12

Palmer Fletcher, et al., v. A. O. Smith, et al.
Circuit Court of Humphreys County, Mississippi; Civil Action No. 2002-0162;

Michael R. Flynn, et al., v. ACCO Chain & Lifting, et al
Second Judicial District, Jones County, Mississippi; Civil Action No. 2002-144-CV4;

Bobby G. Hall, et al., v. A. O. Smith, et al.
Circuit Court of Adams County, Mississippi; Civil Action No. 02-KV-0817-J

Estate of Charles Holder, et al v. Westinghouse Electric Corporation, et al
Circuit Court of Jones County, Mississippi; Second Judicial District; Civil Action No. 2000-134-CV8

Charles W. Irby, et al., v. A-Bex Corporation, et al
Second Judicial District of the Circuit Court of Jones County, Mississippi; Civil Action No.: 2002-31-CV1

Edward Jones, et al. vs. A. O. Smith, et al.,
Circuit Court of Jasper County, Mississippi; First Judicial District; Civil Action No. 12-0148



Wendell R. Lambert, et al., v. A. O. Smith, et al.
Circuit Court of Lawrence County, Mississippi; Civil Action No. 2002-0105

Fred Newsom, v. A. O. Smith, et al.
Circuit Court of Lawrence County, Mississippi; Civil Action No. 2004-0144E
Originally filed in and severed and transferred from:
Wendell R. Lambert, et al., v. A. O. Smith, et al.
Circuit Court of Lawrence County, Mississippi; Civil Action No. 2002-0105

Samuel McDuffey, v. A. O. Smith, et al.
Circuit Court of Lawrence County, Mississippi; Civil Action No. 2004-0143E
Originally filed in and severed and transferred from:
Wendell R. Lambert, et al., v. A. O. Smith, et al.
Circuit Court of Lawrence County, Mississippi; Civil Action No. 2002-0105

Robert E. Pitts, et al. v. Metropolitan Life Insurance Company, et al.
Circuit Court of Jones County, Mississippi, Second Judicial District ; Civil Action No. 2001-3-CV1

Paul Touchstone, et al., v. A-Bex Corporation, et al
Second Judicial District, Jones County, Mississippi; Civil Action No. 2002-2-CV1

Ronald Adams v. Alco Industries, et al.
In the United States District Court For the Southern District of Mississippi
Southern Division ; Civil Action No. 1:04CV730GRo

John Alamia, et al. v. A. O. Smith, et al.
Asbestos Products Liability Litigation (No. VI); Civil Action No. MDL 875
United States District Court for the Southern District of Mississippi,
Southern Division
Civil Action No. 1:04CV750Gro
originally filed in and severed and transferred from:
Emery Burch, et al. v. A. O. Smith, et al.
Circuit Court of Jones County, Mississippi; First Judicial District; Civil Action No. 2002-90-CV12

Aminte Defore, et al. v. A.O. Smith, et al.;
Asbestos Products Liability Litigation (No. VI); Civil Action No. MDL 875
In the United States District Court for the Southern District of Mississippi,



Southern Division; Civil Action No. 1:04CV656GRo;
originally filed in and severed and transferred from:
Edward Jones, et al v. A. O. Smith, et al;
In the Circuit Court of Jasper County, Mississippi, ; Civil Action No. 12-0148

Ben Dickens, et al. v. A. R. Wilfley & Sons, et al.;
Asbestos Products Liability Litigation (No. VI); Civil Action No. MDL 875
In the United States District Court for the
Southern District of Mississippi, Southern Division; Civil Action No. 1:04cv641WJG;
originally filed in and severed and transferred from:
Estate of Charles Holder, et al v. Westinghouse Electric Corporation, et al
Circuit Court of Jones County, Mississippi; Second Judicial District; Civil Action No. 2000-134-CV8

Ora Aaron, et al. v. A. R. Wilfley & Sons, et al.;
Asbestos Products Liability Litigation (No. VI); Civil Action No. MDL 875
In the United States District Court for the
Southern District of Mississippi, Southern Division; Civil Action No. 1:04cv603WJG;
originally filed in and severed and transferred from:
Claude Rhines, et al., v. *A. O. Smith, et al.*
Circuit Court of Covington County, Mississippi; Civil Action No. 2002-191C

Bobby L. Clark, et al., v. A.W. Chesterton, et al
Circuit Court of Hinds County, Action No. 251-04-000836-CIV

Roy Barry, et al., v. A.O. Smith, et al.
In the United States District Court for the Southern District of Mississippi
Southern Division; Civil Action No. 1:04CV731GRo

Hubert D. Stuart, et al., v. A.O. Smith, et al
Circuit Court of Hinds County, Mississippi; First Judicial District
Civil Action No. 251-04-244

Paul Brumfield, et al. v. A-Bex Corporation, et al.
In the Circuit Court of Jones County, Mississippi, Second Judicial District
Civil Action No. 2004-253CV12
originally filed in and severed and transferred from:
Paul Touchstone, et al., v. A-Bex Corporation, et al
Second Judicial District, Jones County, Mississippi; Civil Action No. 2002-2-CV1



Harold J. Anderson, et al., v. Goulds Pump Trading Corporation, et al,
Circuit Court of Forrest County, Mississippi, Civil Action No. CI02-0303

Frank Bankston, et al v. Westinghouse Electric Corporation, et al.,
United States District Court, Southern District of Mississippi,
Southern Division, Civil Action No. 1:01CV162GR

Jack Chandler v. American Cyanamid Co., et al.
In the Circuit Court of Jones County, Mississippi; Second Judicial District
Civil Action No. 2005-50-CV3
originally filed in and severed and transferred from:
Estate of Charles Holder, et al v. Westinghouse Electric Corporation, et al
Circuit Court of Jones County, Mississippi; Second Judicial District; Civil
Action No. 2000-134-CV8

Archie W. Courtney v. Acco Chain & Lifting, et al.
In the Circuit Court of Jones County, Mississippi, Second Judicial District
Civil Action No. 2004-219-CV9
originally filed in and severed and transferred from:
Michael R. Flynn, et al., v. ACCO Chain & Lifting, et al
Second Judicial District, Jones County, Mississippi; Civil Action No.
2002-144-CV4;

Thurman Ferguson, v. Circuit Court of Adams County, Mississippi; Civil
Action No. 02-KV-0817-J
originally filed in and severed and transferred from:
Bobby G. Hall, et al., v. A. O. Smith, et al.
Circuit Court of Adams County, Mississippi; Civil Action No. 02-KV-
0817-J

Donald Dunaway, v. A.O. Smith, et al; Circuit Court of Forrest County,
Mississippi; Civil Action No. CI-05-0022
originally filed in and severed and transferred from:
Claude Rhines, et al., v. A. O. Smith, et al.
Circuit Court of Covington County, Mississippi; Civil Action No. 2002-
191C

J. C. Butler, v. A. O. Smith, et al.
Circuit Court of Lawrence County, Mississippi; Civil Action No. 2004-
0141E
Originally filed in and severed and transferred from:
Wendell R. Lambert, et al., v. A. O. Smith, et al.
Circuit Court of Lawrence County, Mississippi; Civil Action No. 2002-
0105



Willie Funches, v. A. O. Smith, et al.

Circuit Court of Lawrence County, Mississippi; Civil Action No. 2004-0142E

Originally filed in and severed and transferred from:

Wendell R. Lambert, et al., v. *A. O. Smith, et al.*

Circuit Court of Lawrence County, Mississippi; Civil Action No. 2002-0105

James Parish v. American Standard, Inc., et al.

In the Circuit Court of Jones County, Mississippi; Second Judicial District
Civil Action No. 2005-51-CV3

originally filed in and severed and transferred from:

Estate of Charles Holder, et al v. Westinghouse Electric Corporation, et al

Circuit Court of Jones County, Mississippi; Second Judicial District; Civil
Action No. 2000-134-CV8

Faye E. Hamilton, etc. v. Allen-Bradley Co., et al.

United States District Court, Southern District, Southern Division
Civil Action No. 1:04CV732Gro

Henry T. Ray v. Acco Chain & Lifting, et al.

In the Circuit Court of Jones County, Mississippi, Second Judicial District
Civil Action No. 2004-218-CV9

originally filed in and severed and transferred from:

Michael R. Flynn, et al., v. ACCO Chain & Lifting, et al

Second Judicial District, Jones County, Mississippi; Civil Action No.
2002-144-CV4;

Charles Shannon, Jr. v. Acco Chain & Lifting, et al.

In the Circuit Court of Jones County, Mississippi, Second Judicial District
Civil Action No. 2004-220-CV9

originally filed in and severed and transferred from:

Michael R. Flynn, et al., v. ACCO Chain & Lifting, et al

Second Judicial District, Jones County, Mississippi; Civil Action No.
2002-144-CV4;

Larry Thigpen v. Acco Chain & Lifting, et al.

In the Circuit Court of Jones County, Mississippi, Second Judicial District
Civil Action No. 2004-221-CV9

originally filed in and severed and transferred from:

Michael R. Flynn, et al., v. ACCO Chain & Lifting, et al

Second Judicial District, Jones County, Mississippi; Civil Action No.
2002-144-CV4;

Thomas Wilson v. Westinghouse Electric Corporation, et al

Circuit Court of Perry County, Mississippi

Civil Action No. 2004-0027CI

originally filed in and severed and transferred from:



Estate of Charles Holder, et al v. Westinghouse Electric Corporation, et al
Circuit Court of Jones County, Mississippi; Second Judicial District; Civil
Action No. 2000-134-CV8

Debtor can obtain copies all pleadings, documents and orders filed regarding said claimant by reviewing said court files.

Additionally, claimant objects to this request in that it seeks information which is confidential and protected by the terms of certain settlement agreements.

Further, to the extent, claimant has been deposed and plaintiff and/or his counsel has copies of same, said transcript is being attached.

b. Claimant objects to these requests as being overly broad, unduly burdensome, oppressive and beyond the scope of discovery. Notwithstanding said objection and to the extent claimant has filed a claim regarding asbestos, claimant attaches hereto a chart providing the name of the person or entity against whom the claim was submitted, the date said claim was submitted, and the date payment was received, if any. Finally, claimant objects to this request in that it seeks information which is confidential and protected by the terms of certain settlement agreements and/or trust provisions.

Part IX: Supporting Documentation

Claimant objects to this request as being overly broad, unduly burdensome, oppressive, and beyond the scope of discovery. Without waiving objection, claimant would affirmatively state that numerous document production have occurred in Mississippi Asbestos Litigation wherein certain employers have tendered records which may be responsive hereto. All of said documents are located at Choice Copy Service, 125 South Congress Street, Jackson, Mississippi,



and may be reviewed by Debtor at said location or copied at debtor's expense by direct contact with Choice Copy Service.

RESPECTFULLY SUBMITTED, this the 22 day of December, 2005.


ANTHONY SAKALARIOS, ESQ.
ATTORNEY FOR PLAINTIFFS

ANTHONY SAKALARIOS, ESQ.
MORRIS, SAKALARIOS & BLACKWELL, PLLC
Post Office Drawer 1858
HATTIESBURG, MS 39403-1858
(601)544-3343
(601)544-9814 FACSIMILE



WR GRACE FIQ 010189-0051

F. MARVIN MORRIS, III
ANTHONY SAKALARIOS
CHARLES G. BLACKWELL
*SARA MORRIS FARRIS

MORRIS, SAKALARIOS & BLACKWELL
A PROFESSIONAL LIMITED LIABILITY COMPANY
1817 Hardy Street 39401-4914
P. O. Drawer 1858 39403-1858
Hattiesburg, Mississippi
Telephone 601-544-3343
Facsimile 601-544-9814
www.morris-sakalarios.com

STACEY LEA SIMS
SHAUN R. CADE
CHARLES G. BLACKWELL, JR.
NICHOLAS SAKALARIOS
*also admitted in Alabama

June 23, 2006

SENT VIA UPS
Rust Consulting, Inc.
Claims Processing Agent
RE: W.R. Grace & Co. Bankruptcy
201 S. Lyndale Avenue
Faribault, MN 55021

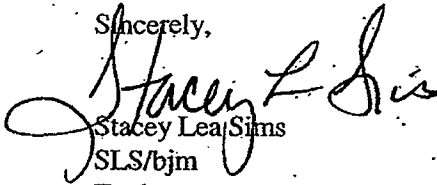
RE: W.R. Grace & Company

Dear Claims Processing:

Enclosed herein in the boxes numbered 1-12, please find original W.R. Grace Asbestos Personal Injury Questionnaires with accompanying documents. Additional questionnaires will be forth coming in the next few days.

Do not hesitate to contact me if you have any questions. Thank you for your attention to this matter.
With kindest personal regard, I remain

Sincerely,


Stacey Lea Sims
SLS/bjm
Enclosure



WR GRACE PIQ 010189-0062

FROM:
SARAH WICKSTRE
(601) 544-3343
MORRIS, SAKALARIOS & BLACKWELL, P
1817 HARDY ST.
HATTIESBURG, MS 39401-4914

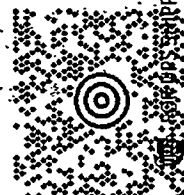
33 LBS 1 OF 1

ATNO 0NDD

SHIP TO:

WR GRACE PROCESSING DEPARTMENT
(601) 544-3343
RUST CONSULTING INC.
201 S. LYNDALE AVENUE
FARIBAULT MN 55021

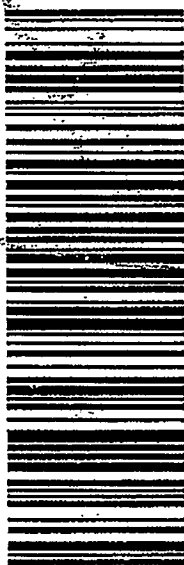
REF 1: MSB-WR GRACE
REF 2: PACKAGE 2 OF 12



MN 550 2-01

UPS GROUND

TRACKING #: 1Z A41 13V 03 4436 9159



BILLING: P/P

Fold here and place in label pouch

NOV 8.0.16 HP LaserJet 854.0A 04/2006

W. R. Grace Asbestos Personal Injury Questionnaire



WR GRACE PIQ 010186-0001



10315607122465

RE:

REDACTED

Morris & Sakalarios

610 West Pine Street

Hattiesburg MS 39401

REC'D JUN 20 2000



000938122465



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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE



WR GRACE PIQ 010185-0083

In re:) Chapter 11
)
W. R. GRACE & CO., et al.,) Case No. 01-01139 (JKF)
) Jointly Administered
Debtors.)
)

W. R. Grace Asbestos Personal Injury Questionnaire

YOU HAVE RECEIVED THIS QUESTIONNAIRE BECAUSE GRACE BELIEVES THAT YOU HAD SUED ONE OR MORE OF THE DEBTORS LISTED IN APPENDIX A ATTACHED TO THIS QUESTIONNAIRE BEFORE GRACE FILED FOR BANKRUPTCY ON APRIL 2, 2001 FOR AN ASBESTOS-RELATED PERSONAL INJURY OR WRONGFUL DEATH CLAIM, AND THAT CLAIM WAS NOT FULLY RESOLVED.

IF YOU HAVE SUCH A CLAIM, YOU MUST COMPLETE AND SUBMIT THIS QUESTIONNAIRE BY JANUARY 12, 2006 TO RUST CONSULTING, INC., THE CLAIMS PROCESSING AGENT, AT ONE OF THE FOLLOWING ADDRESSES:

IF SENT BY U.S. MAIL

RUST CONSULTING, INC.
CLAIMS PROCESSING AGENT
RE: W.R. GRACE & CO. BANKRUPTCY
P.O. BOX 1620
FARIBAULT, MN 55021

IF SENT BY FEDERAL EXPRESS, UNITED PARCEL
SERVICE, OR A SIMILAR HAND DELIVERY SERVICE

RUST CONSULTING, INC.
CLAIMS PROCESSING AGENT
RE: W.R. GRACE & CO. BANKRUPTCY
201 S. LYNDAL AVE.
FARIBAULT, MN 55021

A QUESTIONNAIRE (AND ANY AMENDMENTS OR ADDITIONAL DOCUMENTS IN SUPPORT OF THE QUESTIONNAIRE) WILL NOT BE CONSIDERED UNLESS RECEIVED BY RUST CONSULTING, INC. BY JANUARY 12, 2006.

THIS QUESTIONNAIRE IS AN OFFICIAL DOCUMENT APPROVED BY THE COURT IN CONNECTION WITH ESTIMATING GRACE'S ASBESTOS-RELATED PERSONAL INJURY AND WRONGFUL DEATH CLAIMS AS A WHOLE. THE QUESTIONNAIRE IS BEING USED BY W. R. GRACE AS A MEANS TO SEEK INFORMATION ABOUT YOUR ASBESTOS CLAIM. BY TIMELY RETURNING THE QUESTIONNAIRE AS COMPLETELY AND ACCURATELY AS POSSIBLE, GRACE, THE OFFICIAL COMMITTEES, AND THE FUTURE CLAIMANTS REPRESENTATIVE WILL SEEK TO PRIORITIZE THE PROCESSING OF YOUR CLAIM UNDER ANY TRUST DISTRIBUTION PROCEDURES APPROVED AS PART OF A PLAN OF REORGANIZATION.

THE COURT HAS ORDERED THAT, AS PART OF THE DISCOVERY PROCESS, ALL HOLDERS OF PRE-PETITION ASBESTOS PERSONAL INJURY CLAIMS MUST COMPLETE AND RETURN THIS QUESTIONNAIRE. THUS, FAILURE TO TIMELY RETURN THE QUESTIONNAIRE AS COMPLETELY AND ACCURATELY AS POSSIBLE MAY RESULT IN SANCTIONS AND/OR OTHER RELIEF AVAILABLE UNDER APPLICABLE FEDERAL RULES.

BECAUSE YOUR CLAIM WILL BE EVALUATED IN ACCORDANCE WITH THE TRUST DISTRIBUTION PROCEDURES APPROVED AS PART OF A PLAN OF REORGANIZATION, COMPLETION OF THIS QUESTIONNAIRE DOES NOT MEAN THAT YOUR CLAIM WILL EITHER BE ALLOWED OR PAID. TO THE EXTENT YOU ATTACH TO THIS QUESTIONNAIRE DOCUMENTS ALSO NEEDED BY THE TRUST TO PROCESS YOUR CLAIM, SUCH DOCUMENTS WILL BE PROVIDED TO THE TRUST AND YOU WILL NOT NEED TO RESUBMIT THEM.

INSTRUCTIONS**A. GENERAL**

1. This Questionnaire refers to any lawsuit that you filed before April 2, 2001 for an "asbestos-related wrongful death claim." This term is intended to cover any lawsuit alleging any claim for personal injury, death, or property damage that relates to: (a) exposure to any products or materials containing asbestos that were manufactured, sold, supplied, produced, specified, selected, distributed or in any way marketed by one or more of the Debtors (or any of their respective past or present affiliates, or any of the predecessors of any of the Debtors or any of their respective past or present affiliates), or (b) exposure to vermiculite mined, milled or processed by the Debtors (or any of their respective past or present affiliates, any of the predecessors of any of the Debtors or any of their predecessors' respective past or present affiliates). It includes claims in the nature of or sounding in tort, or under contract, warranty, guarantee, contribution, joint and several liability, subrogation, reimbursement, or indemnity, or any other theory of law or equity, or admiralty for, relating to, or arising out of, resulting from, or attributable to, directly or indirectly, death, bodily injury, sickness, disease, or other personal injuries or other damages caused, or allegedly caused, directly or indirectly, and arising or allegedly arising, directly or indirectly, from acts or omissions of one or more of the Debtors. It includes all such claims, debts, obligations or liabilities for compensatory damages such as loss of consortium, personal or bodily injury (whether physical, emotional or otherwise), wrongful death, survivorship, proximate, consequential, general, special, and punitive damages.
2. Your Questionnaire will be deemed filed only when it has been received by Rust Consulting Inc., the Claims Processing Agent, via U.S. Mail, Federal Express, United Parcel Service or a similar hand delivery service. A Questionnaire that is submitted by facsimile, telecopy or other electronic transmission will **not** be accepted and will **not** be deemed filed.
Do **not** send any Questionnaire to the Debtors, counsel for the Debtors, the Future Claimants Representative, the Official Committee of Unsecured Creditors, the Official Committee of Asbestos Personal Injury Claimants, the Official Committee of Asbestos Property Damage Claimants, the Official Committee of Equity Security Holders, or such Committees' counsel. Questionnaires that are filed with or sent to anyone other than Rust Consulting, Inc. will be deemed not to have been submitted, and such Questionnaires will not be considered.
3. Your completed Questionnaire must (i) be written in English, and (ii) attach relevant supporting materials as instructed further below.
4. All holders of claims described on page i (and as described in further detail in Instruction A (1) above) are required to file this Questionnaire by Jan. 12, 2006. Your Questionnaire will be used in connection with the estimation hearing to be conducted by the Court pursuant to the Estimation Procedures Order (a copy of which is attached as Appendix B).
5. Any subsequent amendment to the Questionnaire will not be considered for any purpose unless received by Jan. 12, 2006.

B. PART I – Identity of Injured Person and Legal Counsel

Respond to all applicable questions. If you are represented by a lawyer, then in Part I (b), please provide your lawyer's name and the name, telephone number and address of his/her firm. If you are represented by a lawyer, he/she must assist in the completion of this Questionnaire. Also, if you would prefer that the Debtors send any additional materials only to your lawyer, instead of sending such materials to you, then check the box indicating this in Part I (b).

All references to "you" or the like in Parts I through X shall mean the injured person. If the injured person is deceased, then the executor of the person's will (or similar estate representative) must complete this Questionnaire.

C. PART II – Asbestos-Related Condition(s)

Please indicate all asbestos-related medical conditions for which you have been diagnosed. To complete questions related to injuries, medical diagnoses, and/or conditions, please use the following categories of customarily diagnosed conditions:

- Mesothelioma
- Asbestos-Related Lung Cancer
- Other Cancer (colon, laryngeal, esophageal, pharyngeal, or stomach)
- Clinically Severe Asbestosis
- Asbestosis
- Other Asbestos Disease

If you have been diagnosed with multiple conditions and/or if you received diagnoses and diagnostic tests relating to the same condition by multiple doctors, please complete a separate Part II for each initial diagnosis and any previous or subsequent diagnoses or diagnostic tests that change or conflict with the initial diagnosis. For your convenience, additional copies of Part II are attached as Appendix C to this Questionnaire.

Supporting Documents for Diagnosis: This Questionnaire must be accompanied by copies, with access to originals upon request, of any and all documents you, your counsel, or your doctors have or subsequently obtain that support or conflict with your diagnosis.

X-rays and B-reads: Please attach all x-ray readings and reports. You may, but are not required to, attach chest x-rays. The court, however, has ruled that Grace may seek access to chest x-rays upon request.

Pulmonary Function Tests: Please attach all pulmonary function test results, including the actual raw data and all spirometric tracings, on which the results are based.